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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91237315
Party	Plaintiff American Marriage Ministries
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

AMERICAN MARRIAGE MINISTRIES,)	Opposition No. 91237315
)	
Opposer,)	Marks: GET ORDAINED
)	Application No. 87430729
v.)	
)	
UNIVERSAL LIFE CHURCH)	
MONASTERY STOREHOUSE, INC.)	
)	Filed: October 18, 2017
Applicant.)	

TESTIMONY FOR PLAINTIFF

Opposer American Marriage Ministries hereby submits the final transcript of the certified corrected transcript of the testimony deposition of George Freeman taken September 11, 2020 (with exhibits and errata sheet). The transcript was not available to Opposer at the close of Plaintiff's Testimony Period, as indicated in Opposer's Notice of Reliance referencing this testimony in Exhibit "Y" to that submission. Applicant has received a copy of the transcript, the transcript errata sheet and the deposition exhibits.

The testimony is relevant as evidence of services offered by Applicant, the relevant public's understanding of the term "get ordained," mode and manner of use of "get ordained" by Applicant, dates of use of "get ordained" by Applicant, knowledge use of "get ordained" by parties other than Applicant. Such evidence is associated with the issue of exclusivity of use, context for use of the term by parties other than the Applicant, inherent distinctiveness, significance of term to the average purchaser of online ordination services, "get ordained" as a source identifier for relevant services, descriptive use of "get ordained," generic use of "get ordained," and damage to the Opposer which would result if a "term of art" or key phrase used by the industry is not available for use.

Dated: November 5, 2020

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CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2020, I served the foregoing Testimony Transcript on the Applicant by emailing to Applicant as follows:

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1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2

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4

5

6 September 11, 2020

7 9:18 a.m. PDT

8

9

10 Videoconference deposition of
11 GEORGE FREEMAN, held remotely via Zoom
12 pursuant to agreement before
13 Marla Sharp, a stenographic reporter
14 certified in California, Oregon, and
15 Washington.

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1 GEORGE FREEMAN - SEPTEMBER 11, 2020

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23 DALLAS GOSCHIE

24 LEWIS KING

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I N D E X

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depo/plf/deft EXHIBITS

EXHIBIT DESCRIPTION PAGE

Exhibit O 1-12-09 e-mail to Dylan Wall 129
from George Freeman (2 pages,
Bates Nos. AMM 00505 -
AMM 00506, confidential)

Exhibit P 12-12-08 e-mail to Justin 154
Hartley and others from
george_galaxy@hotmail.com
(1 page, Bates No. AMM 00066,
confidential)

Exhibit Q E-mail to George Freeman 158
(2 pages, Bates Nos. ULC
Mnstry -- 002673 - ULC
Mnstry -- 002674)

Exhibit R 12-21-13 e-mail to 160
timothy@portent.com and Elaine
Abiera from
george_galaxy@hotmail.com
(4 pages, Bates Nos. ULC
Mnstry -- 002750 - ULC
Mnstry -- 002754)

Exhibit S 1-12-09 e-mail to 164
ulcmonastery@gmail.com from
george_galaxy@hotmail.com
(1 page, Bates No. AMM 00563,
confidential)

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I N D E X
(continued)

dep/plf/deft

EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
Exhibit T	10-27-08 e-mail to pearsonat@gmail.com from george_galaxy@hotmail.com (4 pages, Bates Nos. AMM 00577 - AMM 00580, confidential)	165
Exhibit U	6-7-12 e-mail to Jack Martin from george_galaxy@hotmail.com (1 page, Bates No. ULC Mnstry -- 002682)	168
Exhibit V	1-16-19 deposition transcript of George Freeman (105 pages, not Bates stamped)	142
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1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 FRIDAY, SEPTEMBER 11, 2020

3 9:18 A.M. PDT

4 GEORGE FREEMAN,

5 called as a witness, having been duly

6 sworn by the certified shorthand

7 reporter, was examined and testified as

8 follows:

9 EXAMINATION

10 BY MS. MENNEMEIER:

11 Q Good morning. Could you please state your
12 name for the record?

13 A Could you say that again, Counselor?

14 Q Could you please state your name for the
15 record?

16 A My name is George Freeman.

17 Q Mr. Freeman, do you understand that you are
18 under oath today?

19 A I do.

20 Q Do you understand that that is the same
21 oath that you would take if you were testifying in
22 court?

23 A I do.

24 Q Are you experiencing any condition that
25 might impair your ability to give truthful, complete

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testimony today?

A Age, madam.

Q Any other condition?

A Nothing else.

Q If you do not understand one of my questions today, will you let me know?

A I shall.

Q And if you cannot hear one of my questions, please let me know that as well. Okay?

A Correct.

Q Are you familiar with the Universal Life Church Monastery Storehouse?

A I believe I am.

Q What is your role with the Universal Life Church Monastery Storehouse?

A Presiding chaplain.

Q Do you have any other role with the Universal Life Church Monastery Storehouse?

A All the duties that follow thereunder.

Q How long have you been in that role?

A Sometime in 2006.

Q Would ULCMS -- or excuse me.

Was the Universal Life Church Monastery Storehouse founded in 2006?

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 A I believe it was.

3 Q Can we agree that, if I use the term
4 "ULCMS" today, that by that I mean the Universal
5 Life Church Monastery Storehouse?

6 A Correct. I just use "Monastery." It's
7 simpler.

8 Q Okay. So if you use "Monastery," can I
9 understand that you're referring to the Universal
10 Life Church Monastery Storehouse?

11 A Exactly.

12 MR. MATESKY: I don't mean to interrupt,
13 but I know in a prior deposition there was some
14 confusion between use of the term "monastery" and
15 whether that refers to TheMonastery.org.

16 So I agree with trying to make clear what
17 everyone's referring to. I just want to point out
18 that there is the potential for confusion. But
19 hopefully we're all be very clear.

20 MS. MENNEMEIER: Absolutely.

21 THE WITNESS: Could I use "Storehouse"?

22 MR. MATESKY: It's fine with -- yeah, I
23 mean, that's fine with me. That's one that's
24 probably not going to be confused with anything
25 else. So --

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 THE WITNESS: Okay.

3 MR. MATESKY: -- if that's okay with Kelly,
4 then using "Storehouse" to refer to Universal Life
5 Church Monastery Storehouse makes sense to me, if
6 that's okay with everyone else.

7 BY MS. MENNEMEIER:

8 Q Yes. If you want to use "Storehouse" to
9 refer to the Universal Life Church Monastery
10 Storehouse, that's fine by me.

11 Can we agree that that's how you'll refer
12 to the Universal Life Church Monastery Storehouse?

13 A I agree to anything.

14 Q Okay. And --

15 MR. MATESKY: I'm going to advise the
16 witness not to agree to anything, but I'll note that
17 he chuckled after that, for the record.

18 Anyway, go ahead. Sorry.

19 BY MS. MENNEMEIER:

20 Q Is it okay if I use the term "Universal" --
21 or, excuse me, the term "ULCMS" to refer to the
22 Universal Life Church Monastery Storehouse?

23 A Prior -- yes.

24 Q Okay. Thank you. That's how I have it in
25 my notes. And I want to make sure that, if I say

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 that, you understand what I mean.

3 Does ULCMS ordain people?

4 A It doesn't. It allows people to get
5 ordained and verify the fact that they are ordained.
6 We're recording instruments.

7 Q Who uses ULCMS's ordination services?

8 A People that have a calling.

9 Q Do people who want to get ordained use
10 ULCMS' ordination services?

11 MR. MATESKY: Objection. Vague in the use
12 of "get ordained."

13 But you may answer.

14 THE WITNESS: Not all. Some do; some
15 don't.

16 BY MS. MENNEMEIER:

17 Q Okay. Does ULCMS sell products through the
18 GetOrdained.org website?

19 A I didn't hear the last part.

20 Q Does ULCMS sell products through the
21 GetOrdained.org website?

22 A I think Universal Life Church Monastery
23 Storehouse sells products through TheMonastery.org.

24 Q Does ULCMS also sell products through
25 GetOrdained.org?

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 A GetOrdained sells products through
3 GetOrdained.

4 Q Through GetOrdained.org?

5 A It's an independent store.

6 Q Is the GetOrdained store run by ULCMS?

7 A Headquarters in Seattle. We have propriety
8 and ownership of those various domains.

9 Q When you say "we," who do you mean?

10 A Storehouse and ministries.

11 Q Sorry. I didn't mean to cut you off there.

12 So Storehouse runs a -- ULCMS or Storehouse
13 runs a store on the GetOrdained.org website?

14 A The -- if you're looking at a table of
15 organizations, it seems to me that our intent is
16 that they're individual domains and websites.

17 So for me to put them in separate
18 categories is the way that I see it. I don't see
19 this great big conglomerate. So GetOrdained is an
20 entity unto itself, registered, I believe, in the
21 state where its registry shows.

22 Q Is it your testimony that GetOrdained is an
23 independent organization?

24 A I said domain and website and shopping
25 cart.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 Q Okay. Is GetOrdained not -- is there
3 something different than -- is there a GetOrdained
4 organization that operates the GetOrdained.org
5 domain?

6 A I thought that I laid that out. It is
7 under the auspices of Universal Life Church
8 Ministries.

9 Q Is Universal Life Church Ministries the
10 same as Universal Life Church Monastery Storehouse?

11 A It don't look like it.

12 Q Are Universal Life Church Ministries and
13 Universal Life Church Monastery Storehouse separate
14 organizations?

15 A They're separate domains, separate
16 websites, and they have similar structure in terms
17 of shopping carts and products.

18 Q Okay. I understand that they're separate
19 domains.

20 Are they separate organizations?

21 A I believe that they are registered
22 independently.

23 Q Are products sold on the GetOrdained.org
24 domain?

25 A I missed the first part of your question.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 Q Are products sold on the GetOrdained.org
3 domain?

4 A Did you say "permits"?

5 Q Products.

6 A Oh, products. They're sold on every
7 website.

8 Q And, specifically, is it minister supplies
9 that are sold on the GetOrdained.org domain?

10 A There are ministerial products sold on that
11 website and other websites.

12 Q Have products always been sold directly
13 through the GetOrdained.org domain?

14 A Not always, no.

15 Q Wasn't there a period of time during which
16 the GetOrdained.org website redirected people to
17 TheMonastery.org website to purchase products?

18 MR. MATESKY: Objection. Leading.

19 Go ahead.

20 THE WITNESS: People were able to make the
21 option of choosing to go there. But, no, they did
22 not have to leave. It has its own blogs. It has
23 its own tutorials. It was not directly related
24 until it had a shopping cart, I believe.

25 ///

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2 BY MS. MENNEMEIER:

3 Q When did the GetOrdained.org website start
4 having a shopping cart?

5 A Oh, I don't know, ma'am. We'd have to go a
6 Wayback Machine.

7 Q Before GetOrdained.org had a shopping cart,
8 could people buy products from the GetOrdained.org
9 website?

10 A They can now. Previously, they could not.

11 Q Okay. And do you know when people started
12 being able to buy products from the GetOrdained.org
13 website?

14 A Somewhere between three and five years ago.
15 I don't have that date.

16 Q Okay. Mr. Freeman, is it possible for
17 somebody to get ordained through an organization
18 besides ULCMS?

19 MR. MATESKY: Objection. Vague in use --
20 excuse me -- of the phrase "get ordained."

21 Go ahead.

22 THE WITNESS: Counsel, I sort of lost the
23 first part of your question.

24 BY MS. MENNEMEIER:

25 Q Is it possible for somebody to get ordained

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 through an organization besides ULCMS?

3 MR. MATESKY: Same objection regarding
4 ambiguity of the phrase "get ordained" in this
5 context.

6 Go ahead.

7 THE WITNESS: Could you rephrase that?

8 BY MS. MENNEMEIER:

9 Q Yeah. Is it possible for somebody to get
10 ordained through an organization that is not
11 Storehouse?

12 MR. MATESKY: Same objection.

13 THE WITNESS: I would assume so. I've
14 never done that.

15 BY MS. MENNEMEIER:

16 Q Well, you did not get ordained through
17 ULCMS, right?

18 MR. MATESKY: Objection. Leading.
19 Objection. Vague.

20 THE WITNESS: No, I did not. It came after
21 I was ordained.

22 BY MS. MENNEMEIER:

23 Q Right. You got ordained through the
24 Universal Life Church based out of Modesto, right?

25 MR. MATESKY: Objection. Leading, assumes

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 facts not in evidence.

3 THE WITNESS: Decades ago.

4 BY MS. MENNEMEIER:

5 Q Decades ago you got ordained through the
6 Universal Life Church in Modesto, right?

7 MR. MATESKY: Same objections.

8 THE WITNESS: Correct.

9 BY MS. MENNEMEIER:

10 Q Can you explain why you got ordained?

11 MR. MATESKY: Same objections regarding
12 vagueness, ambiguity, use of the phrase "get
13 ordained."

14 Go ahead.

15 THE WITNESS: I had a church, performing
16 church duties, ecclesiastical duties,
17 sacerdotal [sic] duties.

18 BY MS. MENNEMEIER:

19 Q And what about having a church led you to
20 get ordained?

21 MR. MATESKY: Same objections regarding use
22 of the term "get ordained."

23 THE WITNESS: An inner spirit.

24 BY MS. MENNEMEIER:

25 Q Is it true that you also got ordained

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 through a different organization, Gospel Ministries?

3 THE WITNESS: Oh, you have that.

4 MR. MATESKY: Same objections. Leading.

5 Give me a minute, George.

6 Same objection regarding use of the phrase
7 "get ordained" as well as leading the witness.

8 Go ahead, George.

9 THE WITNESS: You have that.

10 BY MS. MENNEMEIER:

11 Q Is that accurate?

12 A I think my prior testimony, I said that.
13 So I certainly don't want to controvert what I said
14 previously.

15 Q Well, I just want to understand whether
16 it's true that you got ordained through an
17 organization called Gospel Ministries.

18 MR. MATESKY: Objection. Form. Not a
19 question.

20 BY MS. MENNEMEIER:

21 Q Is that true?

22 MR. MATESKY: Objection. Leading.

23 THE WITNESS: I said that in answer just
24 prior to the objections.

25 MR. MATESKY: Just to help clarify.

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2 George, I don't think she's -- she's asking whether
3 it's true. And I think earlier you referred to
4 prior testimony. But without referring to prior
5 testimony, I think that's what she's asking.

6 MS. MENNEMEIER: Right.

7 THE WITNESS: Oh. I did, somewhere in the
8 '70s, become a minister through Gospel Ministries
9 out of California.

10 BY MS. MENNEMEIER:

11 Q Okay. People choose to get ordained for a
12 variety of reasons, right?

13 MR. MATESKY: Objection. Leading the
14 witness. Objection. Use of "get ordained" is
15 ambiguous in this context.

16 THE WITNESS: I don't know what people do,
17 but I would assume that you are somewhat correct.

18 BY MS. MENNEMEIER:

19 Q Do some people get ordained so that they
20 can officiate weddings?

21 MR. MATESKY: Objection. Calls for
22 speculation, information outside the witness's
23 personal knowledge. Also vague and ambiguous
24 regarding use of the phrase "get ordained."

25 Go ahead, George.

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2 THE WITNESS: As I said prior, I really
3 don't know. But I do know some people get ordained
4 on GetOrdained --

5 BY MS. MENNEMEIER:

6 Q Do some --

7 A -- for personal reasons.

8 Q Did you -- "for personal reasons"? Is that
9 what you said? I'm sorry. I might have missed
10 that.

11 A Yes.

12 Q Okay. Are you aware that other
13 organizations use the phrase "get ordained"?

14 A I've seen that.

15 Q Where have you seen that?

16 A On the Internet.

17 Q Have you looked at the websites for
18 organization -- for other organizations that ordain
19 people?

20 A I scroll through now and then. I'm very
21 busy.

22 MR. MATESKY: I'm going to object to -- I
23 just object to the question and use of the phrase
24 "ordain people." But witness has answered.

25 ///

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 BY MS. MENNEMEIER:

3 Q Do you know, from looking at those
4 websites, whether other organizations use the phrase
5 "get ordained"?

6 MR. MATESKY: Objection. Asked and
7 answered.

8 THE WITNESS: From all the hearings we've
9 had and discussions, I would assume they do.

10 BY MS. MENNEMEIER:

11 Q Do you know whether they do?

12 A Well, I have no confirmation of anything
13 unless I see it or we ordain. I can't tell what
14 other folks do.

15 Q Do you have any personal recollection,
16 sitting here today, of seeing another organization
17 that uses the phrase "get ordained" on its website?

18 A I've seen the term, but I don't know the
19 actuality of the transaction.

20 Q Are you aware that the phrase "get
21 ordained" is a phrase that lots of other people use?

22 MR. MATESKY: Objection. Leading the
23 witness, calls for information outside the witness's
24 personal knowledge.

25 Go ahead.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 THE WITNESS: For us, it's our branding.

3 For other people, it's a word like most words in our
4 language.

5 BY MS. MENNEMEIER:

6 Q Are you aware of whether other people use
7 the phrase "get ordained" when they're talking about
8 ordination services?

9 A I don't know what other people do.

10 Q Well, you testified earlier that you had
11 seen other people -- other uses of the phrase "get
12 ordained" on some other websites, right?

13 MR. MATESKY: Objection. Mischaracterizes
14 prior testimony.

15 I don't believe that's what he said. He
16 said he didn't know what other people do.

17 Anyway, go ahead.

18 THE WITNESS: I've seen the word, but I've
19 never been with another person on another webs- -- a
20 website.

21 BY MS. MENNEMEIER:

22 Q I'm sorry. I didn't understand that last
23 bit of your answer. Could you repeat that?

24 A I said I've seen other people in the news
25 or wherever who have got ordained, but I don't know

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 unless I see it somewhere in a newspaper or
3 television.

4 Q Okay. Have you seen any other
5 organization, not in the news but on their own
6 website, use the phrase "get ordained"?

7 MR. MATESKY: Objection. Asked and
8 answered.

9 THE WITNESS: I did answer that before.
10 I've seen the word.

11 BY MS. MENNEMEIER:

12 Q You've seen the words "get ordained" on
13 their websites?

14 MR. MATESKY: Objection.

15 THE WITNESS: I've seen the words.

16 MR. MATESKY: Asked and answered.

17 BY MS. MENNEMEIER:

18 Q Sorry. I missed your answer, Mr. Freeman.

19 A I didn't hear what you said, Counsel.

20 MR. MATESKY: Marla, did you get
21 Mr. Freeman's answer?

22 (The record was read as follows:

23 Q Have you seen any other
24 organization, not in the news, but on
25 their own website use the phrase "get

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 ordained"?

3 MR. MATESKY: Objection. Asked and
4 answered.

5 THE WITNESS: I did answer that
6 before. I've seen the word.

7 Q You've seen the words "get ordained"
8 on their websites?

9 MR. MATESKY: Objection.

10 THE WITNESS: I've seen the words.

11 MR. MATESKY: Asked and answered.)

12 BY MS. MENNEMEIER:

13 Q Okay. Mr. Freeman, I sent a number of
14 exhibits to your counsel earlier this morning.

15 Have you received a copy of those exhibits?

16 A No, I did not.

17 MR. MATESKY: I think --

18 THE WITNESS: I may have.

19 MR. MATESKY: -- through e-mail. Maybe
20 check. It was after the deposition began, I
21 believe -- or after we tried to get it to begin,
22 anyway.

23 MS. MENNEMEIER: Why don't we take a
24 one-minute break just to allow you to check your
25 e-mail and find those exhibits. And if you can have

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 those exhibits available, that would be helpful.

3 THE WITNESS: I'm not computer literate.

4 Might surprise you.

5 BY MS. MENNEMEIER:

6 Q Would it be helpful if I shared my screen
7 instead?

8 A That's a bad thing to ask me. Why don't
9 you just show them on your screen?

10 Q I can do that.

11 MR. MATESKY: Let's try that.

12 BY MS. MENNEMEIER:

13 Q I can do that. Okay. Then I'm going to
14 direct your attention to the Exhibit --

15 MR. MATESKY: Kelly, if you could just wait
16 30 seconds, because I might want to look at them
17 separately. I'm going to get them up. Give me one
18 second.

19 BY MS. MENNEMEIER:

20 Q I'm going to direct your attention to the
21 exhibit that has been prelabeled Exhibit O.

22 (Exhibit O was marked for
23 identification by the reporter.)

24 BY MS. MENNEMEIER:

25 Q And I'm putting that up on my screen right

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 now. Do you see that exhibit?

3 A I do.

4 MR. MATESKY: Counsel, could you hold on
5 just a second? Just give me a minute.

6 MS. MENNEMEIER: I'll hold off on questions
7 until you've got it, Mike.

8 MR. MATESKY: Okay. Okay. Okay. Thank
9 you.

10 MS. MENNEMEIER: I just want to make sure
11 that the technology's working.

12 MR. MATESKY: Sure. For some reason -- ah,
13 there we go.

14 Okay. I'm ready.

15 BY MS. MENNEMEIER:

16 Q Okay. Mr. Freeman, can you see the exhibit
17 that's been labeled Exhibit O?

18 A I see it.

19 Q Okay. Does this document show an e-mail?

20 A It does.

21 Q And, looking at the e-mail addresses listed
22 in this document, do you see your e-mail address?

23 A It is.

24 Q Is your e-mail address
25 george_galaxy@hotmail.com?

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 A It is and was.

3 Q Did you send this e-mail?

4 A To Dylan Wall --

5 Q You sent this --

6 A -- your client. Yes.

7 Q Okay. And did you send this e-mail on
8 January 12th, 2009?

9 A It says I did.

10 Q Okay. Is this an accurate copy of the
11 e-mail that you sent to Dylan Wall on January 12th,
12 2009?

13 I can scroll through it if you need to see
14 more of it.

15 A I haven't read everything, but --

16 MR. MATESKY: George, take your time and
17 look at the document --

18 THE WITNESS: Okay.

19 MR. MATESKY: -- before you answer
20 questions about it. And if you want her to scroll
21 down further, just let her know.

22 THE WITNESS: I read that.

23 BY MS. MENNEMEIER:

24 Q Okay. Is this an accurate copy of the
25 e-mail that you sent to Mr. Wall on January 12th,

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 2009?

3 A I will say that it could have been altered
4 by your side. But if it came from my computer in
5 Dallas or counsel sent it to you, then I would
6 confirm that it came and it is correct.

7 Q Do you have any reason to believe that this
8 document inadequately reflects your e-mail to
9 Dylan Wall on January 12th, 2009?

10 A I heard "is there any reason" and after --
11 could you repeat?

12 Q Absolutely. Do you have any reason to
13 believe that this document inaccurately reflects the
14 e-mail that you sent to Dylan Wall on January 12th,
15 2009?

16 A Without further examination, it looks to be
17 real.

18 Q Okay. Now, I'm going to set this e-mail
19 aside for a moment. So I'm going to stop sharing.

20 Do you agree that the phrase "get ordained"
21 can be understood to mean "become a minister"?

22 MR. MATESKY: Objection. Calls for
23 speculation, information outside the witness's
24 personal knowledge. Also vague as to who's doing
25 the understanding.

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2 THE WITNESS: Let's say they're two
3 separate words with two separate meanings. Our
4 whole concept of religion is one created by our
5 consciousness.

6 Many of the gods -- and I'm going to duck
7 so that you can look at the chart behind me. Man
8 has always had numerous gods. They've morphed back
9 and forth.

10 So when -- becoming a minister has a far
11 different meaning than a urge or a epiphany that one
12 has a calling.

13 So I can't answer your question because I
14 believe they are separate meanings.

15 BY MS. MENNEMEIER:

16 Q I'm going to move to strike that answer as
17 nonresponsive.

18 I think you may have been answering a
19 different question than the one that I asked. And
20 so let me try again with my question. And let's see
21 if we can get an answer to my question.

22 MR. MATESKY: And I'm just going to object.
23 I do believe he answered your question. Even if
24 it's possible that some of the answer was not in
25 direct response, I do believe he did directly

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2 respond to the question. But go ahead.

3 BY MS. MENNEMEIER:

4 Q Do you agree that the phrase "get ordained"
5 can mean "become a minister"?

6 MR. MATESKY: Same objections as before.
7 Asked and answered.

8 THE WITNESS: I don't believe the two have
9 the same meaning.

10 People get ordained through the religious
11 perception of Christianity by a calling. They don't
12 become a minister through a calling.

13 BY MS. MENNEMEIER:

14 Q Okay. Do you agree that the phrase "get
15 ordained" can mean "become a person who's qualified
16 to perform marriage ceremonies"?

17 MR. MATESKY: Objection. Calls for
18 witness -- excuse me -- information outside the
19 witness's personal knowledge, vague, and
20 speculation.

21 THE WITNESS: Interesting question. I --
22 what I believe, I've already stated. To have a
23 calling and then become a minister to do a wedding
24 is not related to a calling.

25 A calling is a divine thought process that

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2 one receives from a higher entity or subconscious.

3 BY MS. MENNEMEIER:

4 Q Do you know whether anyone else ever uses
5 the phrase "get ordained" to mean "become a
6 minister"?

7 A I don't.

8 Q Do you know whether anyone else does?

9 MR. MATESKY: Objection. Asked and
10 answered. He just answered your question.

11 MS. MENNEMEIER: He answered a different
12 question.

13 MR. MATESKY: You asked him does he know
14 something. He said, "I don't." I don't know why
15 you want to ask him again.

16 BY MS. MENNEMEIER:

17 Q So you do not know whether anybody else
18 uses the phrase "get ordained" to mean --

19 A As counsel just said, I answered your
20 previous question. I like talking with you, but I
21 don't need to answer again.

22 Q And, I'm sorry, I, I think, forgot the
23 exact question that I had asked you. I was thinking
24 a step ahead and thought you'd answered it -- next
25 question in my head.

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2 A Wait till you get my age.

3 (Interruption by the reporter.)

4 BY MS. MENNEMEIER:

5 Q Is it your testimony today that you do not
6 know how other -- whether other people use the
7 phrase "get ordained" to describe the process of
8 becoming someone qualified to perform marriage
9 ceremonies?

10 MR. MATESKY: I believe that's been asked
11 and answered.

12 But go ahead, George.

13 THE WITNESS: I think "ordain" and
14 "initiation" are parallel command words. We can
15 ordain somebody into a fraternity, become a Mason.
16 And it's preordained, as a direction or a point in
17 time, that we reach a destination.

18 So the word which we use as our brand name
19 is my perception.

20 BY MS. MENNEMEIER:

21 Q Mr. Freeman, you've given prior testimony
22 in this case; is that right?

23 A Much.

24 Q Among other things, you gave a deposition
25 on January 16th, 2019; is that right?

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2 A That's my mother's birthday, but I don't
3 remember what I said.

4 Q Well, when you gave that deposition, you
5 were under oath, right?

6 A Always, with you.

7 Q And there was a court reporter that was
8 there at your deposition; is that true?

9 A Say that again, ma'am.

10 Q Was there a court reporter at your
11 deposition?

12 A I don't remember. But if you say so, I
13 will believe you.

14 Q After your deposition, you had an
15 opportunity to review your testimony, right?

16 MR. MATESKY: Objection. Leading.

17 Go ahead.

18 THE WITNESS: After the deposition, counsel
19 asked me to review?

20 MR. MATESKY: Object.

21 George, I'm going to tell you don't discuss
22 the content of our correspondence.

23 THE WITNESS: Okay. I don't even remember,
24 so...

25 MR. MATESKY: Maybe you could ask him the

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2 question again.

3 MS. MENNEMEIER: Yep.

4 BY MS. MENNEMEIER:

5 Q After your deposition, you reviewed your
6 testimony, right?

7 MR. MATESKY: Objection. Leading.

8 THE WITNESS: I don't recall the date.
9 Give me the date.

10 BY MS. MENNEMEIER:

11 Q I don't have the date that you reviewed
12 your testimony, but you did have an opportunity to
13 review and correct your testimony after your
14 deposition.

15 A From January 16th?

16 MR. MATESKY: Objection to the form --
17 sorry. Sorry. Objection to the form of the
18 question. I don't believe there was a question
19 there. It's testifying and leading the witness.

20 THE WITNESS: My question to you,
21 Counselor: Are we referring to my mother's birthday
22 date?

23 BY MS. MENNEMEIER:

24 Q Well, after the deposition that took place
25 on January 16th, 2019, did you receive a copy of the

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2 transcript of that deposition?

3 A I probably did, but I don't remember
4 anything of that deposition.

5 Q Did you have an opportunity to read the
6 transcript of the deposition?

7 A I always do, but I don't remember.

8 Q Did you have an opportunity to correct any
9 testimony that was taken down inaccurately at that
10 deposition?

11 A At the time I believe I had that
12 opportunity. Most attorneys usually ask me to. But
13 if it isn't fresh, I don't remember.

14 Q After you reviewed the transcript and made
15 any necessary corrections, did you sign a copy of
16 the transcript?

17 MR. MATESKY: Objection. Assumes facts not
18 in evidence.

19 THE WITNESS: I do what counsel requires.
20 So if they ask something, I comply.

21 But focusing on something six, seven, eight
22 months ago is not good for me. I'm not going to
23 remember papers. Places and things, I have very
24 good recall. But I don't have recall of documents
25 or the associated acts with them.

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2 BY MS. MENNEMEIER:

3 Q Well, and if we get to a point where you
4 don't remember the document, then I can show a copy
5 of it to you. But before we get there, let's see
6 whether you remember what happened -- a bit of what
7 happened.

8 Is it true that, at the June [sic] 16th,
9 2019, depositions, you were asked the following
10 questions and you gave the following answers?

11 Question: "Do you think the phrase
12 'get ordained' describes the process of
13 somebody becoming a person who is
14 qualified to perform marriage
15 ceremonies?

16 Answer: "The evidence is that it's
17 used by a number of people on various
18 websites, and I think it's a fact that
19 some people do.

20 Question: "That some people
21 understand the phrase 'get ordained' to
22 mean becoming somebody qualified to
23 perform marriage services?

24 Answer: "If you're looking to
25 become a minister, yes. I would say

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2 those people that are looking to get
3 ordained to become a minister."

4 MR. MATESKY: I object to the question.

5 It's testimony. It's referring to documents that
6 have not been introduced into evidence.

7 If you want him to look at the transcript,
8 he can look at the transcript. But this hasn't been
9 introduced into evidence.

10 BY MS. MENNEMEIER:

11 Q Mr. Freeman, do you remember being asked
12 those questions and having given those answers?

13 MR. MATESKY: Same objection.

14 THE WITNESS: Counsel, Mike is right. You
15 can't, and I can't, recall anything said by me
16 during a court hearing unless I have it in front of
17 me.

18 And, to save you time, if I said that and
19 you have a copy, I think you should refer to that
20 copy. And if it's signed and notarized, then I
21 think you could submit it.

22 But to ask me something that I've already
23 said, I think it would be worthless.

24 MR. MATESKY: Counsel, he's already said he
25 can't remember the details from that long ago. I

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2 don't know --

3 MS. MENNEMEIER: And I'm about ready --

4 MR. MATESKY: -- how we're going to get --

5 MS. MENNEMEIER: -- to introduce this
6 document. I just needed to do the proper setup.

7 I'm now going to share a -- I'm going to
8 share my screen. This is going to be Exhibit V.

9 (Exhibit V was marked for
10 identification by the reporter.)

11 MR. MATESKY: Okay. Give me a moment --

12 MS. MENNEMEIER: Which I have not --

13 MR. MATESKY: -- before you ask any
14 questions.

15 MS. MENNEMEIER: -- sent you.

16 MR. MATESKY: Oh.

17 MS. MENNEMEIER: I will send to TSG and you
18 after this deposition is over. But I will share my
19 screen right now.

20 BY MS. MENNEMEIER:

21 Q Mr. Freeman, can you see the screen?

22 A I do.

23 Q Looking at this first page, do you see that
24 this is the start of the transcript of the
25 deposition with you on January 16th, 2019?

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2 A I do.

3 Q Okay. And --

4 MR. MATESKY: I don't see that. Where was
5 that?

6 MS. MENNEMEIER: Okay. So we're on the
7 first page. Middle of the page, it says --

8 MR. MATESKY: Oh, yeah, at the bottom.
9 Sorry. I just --

10 MS. MENNEMEIER: -- "Deposition of
11 George Freeman." And then at the bottom, the second
12 to last line on the page, it says the date.

13 MR. MATESKY: Okay.

14 MS. MENNEMEIER: You see that? Okay.

15 BY MS. MENNEMEIER:

16 Q So scrolling down to page 43. Okay. And,
17 specifically, I'd like to direct your attention to
18 line 16. And I'll read this out again. You were
19 asked the following question:

20 "Do you think the phrase 'get
21 ordained' describes the process of
22 somebody becoming a person who is
23 qualified to perform marriage
24 ceremonies?"

25 Were you asked that question at this

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2 deposition?

3 A I was asked that question.

4 Q And directing your attention to line 21 on
5 that page.

6 The Witness: "The evidence is that
7 it's used by a number of people on
8 various websites, and I think it's a
9 fact that some people do."

10 Did you give that answer?

11 A I did.

12 Q Okay. Directing your attention to line 25
13 and then the beginning of page 44.

14 Question: "That some people
15 understand the phrase 'get ordained' to
16 mean becoming somebody qualified to
17 perform marriage services?"

18 Were you asked that question, Mr. Freeman?

19 A The document says I was.

20 MR. MATESKY: Objection to the extent that
21 it's not a question as phrased in the transcript.

22 BY MS. MENNEMEIER:

23 Q And directing your attention to page 44,
24 line 4.

25 Answer: "If you're looking to

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2 become a minister, yes. I would say
3 those people that are looking to get
4 ordained to become a minister. You can
5 get ordained to do other things, I
6 think, you know. To fight the battle,
7 you know? Get ordained to join the
8 forces. There's a thousands meanings I
9 think you can construct those two words
10 and carry it on to another achievement."
11 Did you give that answer?

12 A I did.

13 Q Okay.

14 MR. MATESKY: And I'm just going to note
15 the same objections as noted in the transcript, that
16 these were questions that have been asked and
17 answered a number of times during that deposition
18 trying to get different answers each time,
19 apparently.

20 MS. MENNEMEIER: And I disagree with your
21 characterization of that, but we can have that
22 disagreement later.

23 BY MS. MENNEMEIER:

24 Q Let's see. I'd like to direct your
25 attention back to Exhibit O. And I will share my

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2 screen of that again for you.

3 Can you see Exhibit O?

4 A I see an e-mail dated 2-26-2018.

5 Q And you see that date -- where do you see
6 that date on the document?

7 A Say that again, please.

8 Q Where do you see that date on the document?

9 A The very top left-hand corner.

10 Q Okay. And then do you see further down in
11 this document that this is the e-mail from
12 January 12th, 2009?

13 A Oh. Yes.

14 Q Okay. Now, looking down a few lines from
15 there, there is a line that says "How to Get
16 Ordained." Do you see that?

17 A I do.

18 Q And underneath it says "by Malcolm Tatum"?

19 A Yes.

20 Q And then there's some text under that?

21 A Yes.

22 Q Looking at the line that says "How to Get
23 Ordained," when the phrase "get ordained" appears in
24 this line, how do you understand the phrase "get
25 ordained"?

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2 MR. MATESKY: Objection. Relevance.

3 THE WITNESS: Somebody wrote it. It is
4 what it is.

5 BY MS. MENNEMEIER:

6 Q When you read it, what do you understand
7 that phrase to mean?

8 MR. MATESKY: Same objection.

9 THE WITNESS: How to get ordained. That's
10 what it says.

11 BY MS. MENNEMEIER:

12 Q Do you think in this context "How to Get
13 Ordained" means how to become a minister?

14 A It doesn't say that. Says --

15 MR. MATESKY: Objection to the --

16 THE WITNESS: -- "How to Get Ordained."

17 MR. MATESKY: So I'm going to object to the
18 extent it calls for information outside the
19 witness's personal knowledge and speculation as to a
20 third party's meaning.

21 MS. MENNEMEIER: Marla, did you get the
22 witness's complete answer?

23 (The record was read as follows:

24 Q Do you think in --)

25 MR. MATESKY: And, just as a reminder --

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2 sorry to interrupt --

3 MS. MENNEMEIER: Mike --

4 MR. MATESKY: -- Marla.

5 Just as a reminder to George, try to give a
6 beat before answering so that I can get an objection
7 in without talking over anybody.

8 THE WITNESS: Sorry.

9 MS. MENNEMEIER: And, Mike, you need to be
10 quicker about your objections as well because you're
11 starting them after he's well into his answer.

12 MR. MATESKY: Well, I'm going to object
13 when the objection comes up. And if George can, you
14 know, wait a little bit, that would be best. But,
15 you know, I can't be Quick Draw McGraw all the time.
16 So --

17 (The record was read as follows:

18 Q Do you think in this context "How to
19 Get Ordained" means how to become a
20 minister?

21 A It doesn't say that.

22 MR. MATESKY: Objection.

23 THE WITNESS: It says "How to Get
24 Ordained.")

25 MR. MATESKY: So I'll --

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2 MS. MENNEMEIER: Did you get the next
3 question and answer? I thought there was more.

4 (The record was read as follows:

5 MR. MATESKY: And I'm going to object to
6 the extent it calls for information
7 outside the witness's personal knowledge
8 and speculation as to a third party's
9 meaning.

10 MS. MENNEMEIER: Marla, did you get the
11 witness's complete answer?)

12 BY MS. MENNEMEIER:

13 Q Setting this article aside, just generally
14 speaking, what do you personally understand the
15 phrase "get ordained" to mean?

16 MR. MATESKY: Objection. Relevance.

17 THE WITNESS: Madam, I explained that
18 earlier. We would have to go back, ask the court
19 reporter to read back to you what I said.

20 MR. MATESKY: And, Kelly, I think you've
21 asked that question --

22 MS. MENNEMEIER: I have not.

23 MR. MATESKY: -- like, five or six times.

24 MS. MENNEMEIER: I have not. I have not
25 asked this specific question, and this is a specific

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2 question that I would like an answer to. I've asked
3 various other -- maybe -- I've asked some nuances on
4 it.

5 But I'm wondering, specifically and
6 personally, what Mr. Freeman understands the phrase
7 "get ordained" to mean.

8 BY MS. MENNEMEIER:

9 Q And so, Mr. Freeman, I'm going to ask that
10 again.

11 Could you please explain to me what you
12 personally understand the phrase "get ordained" to
13 mean?

14 MR. MATESKY: I'm going to object as asked
15 and answered, vague, and ambiguous without any
16 context, and irrelevant.

17 Go ahead, George.

18 THE WITNESS: I said the same thing over
19 and over this morning.

20 And if your intent is to confuse me, I
21 don't think that's digging out the answer that you
22 would want me to say something that isn't true and
23 not pertinent to the issues of our brand and
24 trademark.

25 So I really feel that you have the answer.

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2 You have the testimonies of prior depositions. So
3 why do you repeatedly say the same thing to me?

4 No offense, but we need to move forward.

5 BY MS. MENNEMEIER:

6 Q Mr. Freeman, I understand that you've been
7 asked this question many times in past depositions.
8 And maybe I should have explained this at the
9 beginning of this deposition.

10 But this deposition is specifically my
11 opportunity to obtain trial testimony from you for
12 the "get ordained" opposition proceeding. Your
13 testimony in past depositions is not necessarily
14 going to be considered or presented to the board
15 that's making a decision in this case.

16 And so, unfortunately, even though I've
17 asked you these questions before in some past
18 cases -- or past depositions, here I need to make
19 sure that I've got a clean record. And, to the
20 extent that I have questions for you that I would
21 like the board to hear your answers to in this
22 proceeding, I may need to ask duplicative questions.

23 I'm certainly not trying to confuse you.
24 I'm not trying to trip you up. I'm just trying to
25 make sure that I understand what your answers are

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and that, when this testimony goes to the board, that they understand what your answers are because they're not going to be able to refer back to your past answers.

Does that make sense?

A It makes sense as to what you said, but I've already stated in this deposition my answers to the same question over and over again. And it's rather redundant to try to see if you can make me say something by trying to confuse me. I think it's bad lawyering.

"Get ordained" is different from becoming a minister. "Get ordained" is our brand. "Get ordained" is a calling to do something. And it doesn't pertain to just religion. I gave you examples of fraternities, of a pursuit of life.

And I'm not going to change that answer. So I think I've satisfied your question. With all due respect, can we ask me another question?

Q I think your answer just there was a helpful one, and I appreciate that. And I want to ask a clarifying question, if I may.

Do you understand "get ordained" to mean more than just a brand? Or does it mean

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2 specifically a brand?

3 MR. MATESKY: Objection. Compound.

4 Objection. Asked and answered.

5 You've already asked what "get ordained"
6 means to him, and he's already answered.

7 THE WITNESS: I don't want to repeat what
8 counsel said, but he took the words out of my mouth.

9 BY MS. MENNEMEIER:

10 Q And -- okay.

11 MR. MATESKY: And I'm --

12 MS. MENNEMEIER: Mike --

13 MR. MATESKY: -- just going to object that
14 this is badgering the witness. And, you know, if
15 we're -- you're going to keep doing this, we might
16 have to stop the deposition.

17 BY MS. MENNEMEIER:

18 Q I didn't understand from your last -- from
19 your last answer whether "get ordained" refers only
20 to brand.

21 Does "get ordained" refer only to a brand?

22 MR. MATESKY: Objection. Vague.

23 Objection. No context. Objection. Calls for
24 information outside the witness's personal knowledge
25 and speculation.

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2 You can go ahead and answer, George.

3 THE WITNESS: I think that I answered your
4 question previously as to the implied meanings from
5 my percept of "get ordained."

6 So inside the acts of marriage or applied
7 to a calling, it is what it says it is, "get
8 ordained." For us at GetOrdained.org, it is our
9 brand name.

10 So where else can we go? What else --
11 answer do you need about "get ordained"?

12 BY MS. MENNEMEIER:

13 Q I'd like to direct your attention to an
14 exhibit that's been prelabeled Exhibit P. And I
15 will share my screen with you so that you can see
16 that.

17 (Exhibit P was marked for
18 identification by the reporter.)

19 BY MS. MENNEMEIER:

20 Q Can you see that exhibit?

21 MR. MATESKY: If you want to have her
22 scroll down so that you can look at the whole thing,
23 that's fine, George, although it looks like it's
24 just one page.

25 THE WITNESS: Is there another page besides

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2 18?

3 BY MS. MENNEMEIER:

4 Q No. Just one page.

5 Let me know if you would like me to scroll
6 any further.

7 A This is 2008?

8 MR. MATESKY: Wait until she asks you a
9 question. Or if --

10 BY MS. MENNEMEIER:

11 Q Does this document show an e-mail?

12 A "Does this document" what?

13 Q Does this document show an e-mail?

14 A Oh, yes. I'm looking at Justin Hartley,
15 Dylan Wall, and Jeff Vogt.

16 Q Are those the people who received this
17 e-mail?

18 A These people --

19 MR. MATESKY: Objection to the -- sorry,
20 George.

21 Objection to the extent it calls for
22 information outside his personal knowledge.

23 Go ahead, George.

24 THE WITNESS: These people are all former
25 employees.

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2 BY MS. MENNEMEIER:

3 Q Was this e-mail sent to those people?

4 A You mean my former employees?

5 Q Yes.

6 A Your client? One of your clients.

7 Q One of them.

8 A Was that Dylan Wall?

9 Q Dylan Wall, my understanding is affiliated
10 with American Marriage Ministries, which is --

11 A Right. He's your client.

12 MR. MATESKY: Make sure you wait until
13 she's done talking to you to speak up, George.

14 BY MS. MENNEMEIER:

15 Q Was this e-mail sent to those people?

16 A Those people, yes.

17 Q Who sent this e-mail?

18 A Counselor, it says my name.

19 Q So that means that you sent the e-mail,
20 right?

21 A Assume that you knew that.

22 Q And did you send this e-mail on
23 December 12th, 2008?

24 A It says I did. I don't remember sending
25 it.

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2 Q Is this an accurate copy of the e-mail you
3 sent December 12th, 2008, to Justin Hartley,
4 Jeff Vogt, and Dylan Wall?

5 MR. MATESKY: Objection. Leading.
6 Objection. Assumes facts not in evidence.

7 THE WITNESS: Again, as I said prior, at
8 81, long-term memory runs away.

9 BY MS. MENNEMEIER:

10 Q Understood.

11 A But if you have this document, it says
12 whatever it says.

13 Q Do you have any reason to believe that this
14 document inaccurately reflects your e-mail?

15 A Oh, I'm not doubting. But to say that I
16 have personal knowledge, it's a new refresher for
17 me.

18 Q Okay. I just want to understand whether
19 you think that this e-mail might -- or this document
20 might be inaccurate in some way.

21 A I couldn't tell you that.

22 Q Okay. Then I'm going to direct your
23 attention now to Exhibit Q. And I will pull that up
24 on my screen for you.

25 ///

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2 (Exhibit Q was marked for
3 identification by the reporter.)

4 BY MS. MENNEMEIER:

5 Q Okay. And this exhibit has two pages, so
6 I'll scroll through so that you can see everything.
7 Please let me know if you'd like me to scroll faster
8 or slower.

9 A We can --

10 MR. MATESKY: Counsel, before we introduce
11 this document, was this -- this appears to be a
12 document produced in the federal court litigation.
13 Was this not --

14 MS. MENNEMEIER: Correct.

15 MR. MATESKY: Was this not produced as
16 confidential or AEO?

17 MS. MENNEMEIER: Correct.

18 MR. MATESKY: Okay. George, I think you
19 had a question or you were going to say something.
20 Or maybe not.

21 BY MS. MENNEMEIER:

22 Q Mr. Freeman, does this document show an
23 e-mail?

24 A It shows an e-mail.

25 Q Is this an e-mail that you sent?

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2 A It says I did.

3 Q And specifically -- well, let's see --
4 okay. And is this -- so this top portion shows what
5 appears to be one e-mail.

6 And then, below that, starting at the
7 bottom of page 1 and continuing on to page 2, do you
8 see another e-mail?

9 MR. MATESKY: Objection to the extent
10 counsel's testifying regarding the content.

11 THE WITNESS: I'm reading the document
12 dated 18 May 2012.

13 BY MS. MENNEMEIER:

14 Q Yes, that's exactly what I'm referring to.
15 And is that an e-mail that you sent?

16 A No. It's an e-mail sent to me.

17 Q It's an e-mail sent to you. Okay. And
18 it's an e-mail sent to you by whom?

19 A It says Jack.

20 Q Jack@portentinteractive.com?

21 A That's what it says.

22 Q Okay. Do you have any reason to believe
23 that this document inaccurately reflects the e-mails
24 shown in it?

25 A That this e-mail, which you just said --

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could you repeat after that?

Q Do you have any reason to believe that this document, Exhibit Q, inaccurately reflects your e-mail -- inaccurately reflects the e-mails that are shown in it?

A I don't know if it accurately -- it says what it says.

Q Do you have any reason to believe that anything in this document is an inaccurate copy of those e-mails?

A I can't evaluate that at this time. It is a reply. That, I know. But what they're saying is their opinion. And we, as readers, see, both of us, what the results of the reply here.

So I don't have any comments other than the document is what it is.

Q Okay. Then I'd like to direct your attention to Exhibit R. And I've now shared my screen of that exhibit.

(Exhibit R was marked for identification by the reporter.)

BY MS. MENNEMEIER:

Q Do you see this exhibit?

A I see the exhibit.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 Q Okay. And I will scroll through it. It
3 has four pages, so bear with me. I'll try to scroll
4 through slowly.

5 A Could you scroll a little slower?

6 Q Absolutely.

7 A Right -- just -- back to "Elaine."

8 Q Yes.

9 A Okay.

10 Could you go down?

11 Q Yes, I can.

12 A Stop, please.

13 Keep scrolling down, please. Hold it.

14 Could you go to "Timothy Johnson"?

15 Q Yes.

16 A Stop. The bottom of "Timothy." Thank you.

17 Great. Thank you.

18 Q Okay. Does this document show a series of
19 e-mails?

20 A "Does this document"?

21 Q Does this document show a series of
22 e-mails?

23 A It does.

24 Q Who sent the last e-mail or -- timewise in
25 this chain of e-mails?

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 A Go to the last e-mail.

3 Timothy Johnson.

4 Q Who did he send the e-mail to?

5 A Three Monastery people -- or Storehouse
6 people and one Portent person.

7 Q Did he send the e-mail to you?

8 A My name's there.

9 Q Okay. And that e-mail was -- when was that
10 e-mail sent?

11 A It says January 6, 2014.

12 Q Okay. And then scrolling back up to the
13 top, who sent the first e-mail in this chain of
14 e-mails?

15 A December 21st, it says I'm sending to two
16 Portent people and two Storehouse people.

17 Q Okay. Does that mean that you sent this
18 first e-mail?

19 A "Does that mean"? It means -- the document
20 says who sent and who received. So the document
21 read as it is.

22 Q Does anybody else have access to the
23 george_galaxy@hotmail.com e-mail address?

24 A Oh, gods. When you work with millennials,
25 they want control of everything you do.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 And, to this date, counsel will tell you
3 I've got the most screwed-up e-mail system and
4 bastardized because it's been in other people's
5 hands.

6 So, yeah, other people have my e-mail. But
7 if I read something that I didn't send, I usually
8 will go back and ask.

9 So it seems like, to me, and I'm not
10 contradict [sic] the fact that it was sent by me,
11 but there are gremlins. We know that well.

12 Q Understood. Looking at the bottom of this
13 first e-mail where it includes the signature
14 "George," do you see that?

15 A It does.

16 Q Does that -- based on seeing that, can you
17 tell whether you sent this e-mail?

18 A Well, it's a legitimate question:

19 "One gets ordained free, or becomes
20 a minister, but never 'sells' or 'buys'
21 in a church."

22 Q Is that something you wrote?

23 A My signature's there, and I said I don't
24 think it's a gremlin.

25 Q Okay. Then I'd like to direct your

GEORGE FREEMAN - SEPTEMBER 11, 2020

attention to Exhibit S.

(Exhibit S was marked for
identification by the reporter.)

BY MS. MENNEMEIER:

Q Okay. This is just a one-pager, so I'll
let you take a look at that.

A Wow, two of your clients.

Q Does this document show an e-mail?

A It shows an e-mail sent to Dylan Wall and
Glen, your clients, plus Jeff, my old webmaster.
And I don't know who ulcmonastery@gmail was. It
could have been Maurice King.

Q Who sent this e-mail?

A My name is there, so obviously I sent it.

Q What day did you send this e-mail?

A It says January the 12th, 2009. And that's
before your clients conspired to take our concept
and declare independence on July the 4th.

Q And I'm going to move to strike the portion
of that answer that was nonresponsive to my
question.

And at this point I'm going to direct your
attention to Exhibit T.

///

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 (Exhibit T was marked for
3 identification by the reporter.)

4 BY MS. MENNEMEIER:

5 Q And this is another four-pager. So please
6 let me know when you're ready for me to scroll down
7 so that you can see more.

8 You ready for me to scroll?

9 A I'm laughing at "an army of North
10 Americans." I like that. We need them now.

11 Q -- e-mails?

12 A I've read it.

13 Q Okay. Let me scroll down so that you can
14 see more of this.

15 A Keep going down, please.

16 That's a normal printout when one gets
17 ordained.

18 Q Okay.

19 A Confirmation.

20 Q What appears on page 2 is a printout of the
21 confirmation?

22 A You get that, confirmation that you were
23 your year.

24 Q Anybody --

25 A Not you, but somebody who recently got

GEORGE FREEMAN - SEPTEMBER 11, 2020

ordained.

Q Okay.

A That's part of the printout, I believe.

Q Page 3 is?

A Say that again, please.

Q Is it page 3 that's part of the printout?

I want to make sure it is clear because the record's not going to pick up what page we're looking at.

A So you want me to tell you what it says?

Q No, no. I just want to make sure that it's clear for the record.

So when you say that this is also part of the printout that somebody receives once they've gotten ordained, you're referring to what appears on page 3 of this exhibit?

MR. MATESKY: Objection. Mischaracterizes prior testimony.

THE WITNESS: It's if you go get ordained on our website, you would get that.

BY MS. MENNEMEIER:

Q Okay.

A Can you scroll a little bit?

Q Yep, absolutely.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 A Okay. Go down to the bottom, please. I
3 want to see what are we sending to Dylan Wall and
4 Glen.

5 Q Absolutely. And now we're looking at
6 page 4 of the exhibit.

7 A Okay.

8 Q Okay. Why don't we start here.

9 Page 4 -- does page 4 of this exhibit show
10 an e-mail?

11 A Did I forward it?

12 Q Does this show an e-mail?

13 A It shows an e-mail.

14 Q And who sent the e-mail?

15 A Alex Pearson, I believe.

16 Q Who did he send the e-mail to?

17 A Oh, no, no, no. I'm sorry. You're
18 referring to October 27th --

19 Q Yes.

20 A -- 11:57?

21 Q 11:57 a.m.

22 A Yeah. I sent it to your client, Glen,
23 Dylan Wall and ULC Monastery, which I don't know who
24 in our office at that time would have answered that.
25 That could have been the webmaster or Maurice --

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 Q Okay.

3 A -- King.

4 Q Okay. Then scrolling up to page 1, does
5 page 1 show an e-mail?

6 A It shows an e-mail from me.

7 Q What date did you send this e-mail?

8 A What was what?

9 Q What day did you send --

10 A Oh.

11 Q -- that e-mail?

12 A It says October 27th, 2008.

13 Q Who did you send the e-mail to?

14 A Alex in Canada. And "ulcseattle" was the
15 staff at the office.

16 Q Okay. And then now I'd like to direct your
17 attention to Exhibit U.

18 (Exhibit U was marked for
19 identification by the reporter.)

20 BY MS. MENNEMEIER:

21 Q And this is just one page, but let me know
22 when you need me to scroll down on this page.

23 A Scroll down, please.

24 Go ahead.

25 Q Okay. Does this document show an e-mail?

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 A It does.

3 Q Who sent this e-mail?

4 A It said it came from my e-mail address.

5 Q Do you know whether you sent this e-mail?

6 A As I said previously, most likely.

7 Q Looking at the bottom of this e-mail, it
8 says "George."

9 From seeing that, do you think that you
10 sent this e-mail?

11 A Unless gremlins did, I did.

12 Q Okay. Do you think that gremlins sent this
13 e-mail?

14 A Do I think? It's a legitimate question.
15 Gremlins usually don't do that.

16 Q What day was this e-mail sent?

17 A What day?

18 Q Yes.

19 A It says January [sic] 7th, 2012.

20 Q Who did you send this e-mail to?

21 A It's going to a company that we hire.
22 They're an Internet company.

23 Q Is that company called Portent?

24 A Yes.

25 Q Okay. You testified that the

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 george_galaxy@hotmail.com e-mail address was your
3 e-mail address.

4 Have you ever searched that e-mail account
5 for documents for litigation?

6 MR. MATESKY: Objection. Relevance.

7 THE WITNESS: Everybody else did.

8 BY MS. MENNEMEIER:

9 Q Did you personally search it?

10 A Did I search my --

11 Q (Nodded head.)

12 A I made a qualified attempt.

13 Q Okay. And then you've had other people
14 search it as well?

15 A My staff, when they --

16 MR. MATESKY: I'm going to object.

17 MS. MENNEMEIER: Okay.

18 MR. MATESKY: This could be getting into
19 attorney work product and doesn't really seem
20 relevant to the PTAB action.

21 MS. MENNEMEIER: If I could take just a
22 minute or two to review my notes. I think I may be
23 done with my questions for Mr. Freeman, but I just
24 want to make sure of that.

25 It's 10:44 right now. If we could come

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 back, you know, 10:46. Would that work for
3 everybody?

4 MR. MATESKY: Fine with me.

5 MS. MENNEMEIER: Okay.

6 MR. MATESKY: George, can you mute your
7 phone?

8 THE WITNESS: My telephone?

9 MR. MATESKY: Yeah.

10 THE WITNESS: Just a moment.

11 (Recess taken from 10:45 a.m.
12 to 11:14 a.m.)

13 - - -

14 EXAMINATION

15 BY MR. MATESKY:

16 Q Mr. Freeman, I believe you testified
17 earlier that you sometimes think of different
18 websites operated by Universal Life Church Monastery
19 Storehouse as different entities; is that right?

20 A Correct.

21 Q Is there actually a different corporation
22 separate from Universal Life Church Monastery
23 Storehouse that operates the GetOrdained.org
24 website?

25 A Not a full corporation.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 Q Does Universal Life Church Monastery
3 Storehouse operate the GetOrdained.org website?

4 A Yes, it does.

5 Q So is it accurate to say that, even though
6 you sometimes think of GetOrdained.org as a separate
7 entity, it is actually operated by Universal Life
8 Church Monastery Storehouse?

9 A Correct.

10 MS. MENNEMEIER: Objection. Leading,
11 testifying for the witness.

12 THE WITNESS: I didn't hear you, Counselor.

13 MS. MENNEMEIER: I objected that the
14 question was leading and testifying for the witness.

15 THE WITNESS: Okay.

16 BY MR. MATESKY:

17 Q Is there a different corporation separate
18 from Universal Life Church Monastery Storehouse
19 called Universal Life Church Ministries?

20 A No. Website only.

21 Q Is Universal Life Church Ministries a brand
22 used by Universal Life Church Monastery Storehouse?

23 A Correct, it is.

24 MR. MATESKY: Okay. I am going to
25 introduce a document into evidence. This is

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 Exhibit W. I've sent it to counsel, but I'll also
3 put it up as a screenshare. Have to remind myself
4 how to do that.

5 (Exhibit W was marked for
6 identification by the reporter.)

7 BY MR. MATESKY:

8 Q Okay. Mr. Freeman, I'm going to slowly
9 scroll through this document so you have a chance to
10 look at it.

11 Let me know when you're done with the first
12 page, please.

13 MS. MENNEMEIER: And I'm going to object to
14 this document as being outside the scope of direct,
15 and it was not in exhibits used in direct.

16 THE WITNESS: I've seen the first page.

17 BY MR. MATESKY:

18 Q And, specifically, I'm going to direct you
19 to paragraphs 13 through the end of the Exhibit. So
20 let me know when you've had a chance to read those
21 paragraphs.

22 A Paragraph 13?

23 Q Through the end of the exhibit. So it's 13
24 through 28, I believe. You can take your time. And
25 let me know when you'd like me to scroll down.

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 A I'm finished with 15.

3 It reinforces what I said in this
4 deposition.

5 Q Have you finished --

6 MS. MENNEMEIER: Object to the extent there
7 was no question pending.

8 BY MR. MATESKY:

9 Q Have you finished reading through
10 paragraph 22?

11 A I have.

12 Q Okay. I'm going to scroll down so you can
13 read paragraphs 23 through 28. Please let me know
14 when you're done.

15 A I'm finished with page 4.

16 Q Okay. And I'll scroll down so you can read
17 the very end of paragraph 28.

18 A The page has my signature and my name.

19 Q Do you recognize this document?

20 A I do.

21 MS. MENNEMEIER: I'm also going to object
22 to the extent that this is an improper refreshment
23 of his recollection.

24 BY MR. MATESKY:

25 Q Was this a declaration of yours submitted

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 in this matter?

3 A It has -- it is.

4 Q Do you recall earlier during your testimony
5 today when counsel for AMM referred to your
6 testimony given in a prior deposition?

7 A I do.

8 Q Do the statements in this declaration
9 accurately set forth your beliefs regarding that
10 prior deposition testimony?

11 MS. MENNEMEIER: Objection --

12 THE WITNESS: It does.

13 MS. MENNEMEIER: -- hearsay.

14 MR. MATESKY: Marla, were you able to get
15 that?

16 THE COURT REPORTER: Yes.

17 THE WITNESS: The statement does.

18 BY MR. MATESKY:

19 Q Do the statements in this declaration
20 accurately set forth your beliefs regarding meaning
21 and interpretation of the phrase "get ordained"?

22 MS. MENNEMEIER: Same objection.

23 THE WITNESS: Yes, it does.

24 MR. MATESKY: We have no further questions.

25 MS. MENNEMEIER: Okay. I may have a brief

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 redirect, but if you could give me five minutes.

3 MR. MATESKY: Sure.

4 MS. MENNEMEIER: Thank you.

5 (Recess taken from 11:21 a.m.

6 to 11:23 a.m.)

7 - - -

8 FURTHER EXAMINATION

9 BY MS. MENNEMEIER:

10 Q Mr. Freeman, during the 30-minute break
11 before Mr. Matesky asked you some questions just
12 now, did you talk to your counsel?

13 MR. MATESKY: Object to the extent it
14 mischaracterizes the duration of the break.

15 THE WITNESS: He called me --

16 MR. MATESKY: And I'm just --

17 THE WITNESS: -- yes.

18 MR. MATESKY: And I'm just going to --
19 sorry.

20 I'm just going to instruct the witness to
21 answer the yes-or-no question but not to discuss the
22 content of any discussions.

23 THE WITNESS: Yes.

24 MS. MENNEMEIER: Okay.

25 ///

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 BY MS. MENNEMEIER:

3 Q Earlier I asked you about your deposition
4 testimony at a deposition that took place on
5 January 16th, 2019.

6 At that deposition, when I asked you
7 questions, did you not testify truthfully?

8 MR. MATESKY: Objection. Confusing. Lots
9 of double negatives.

10 BY MS. MENNEMEIER:

11 Q Let me reask that.

12 At that deposition, did you testify
13 truthfully?

14 A Madam, I've been in many depositions over
15 my 80 years, 50 or 60 years in having corporations.
16 Never once have I been accused or thought of not
17 telling the truth. I don't need to lie. The facts
18 bear themselves out.

19 To the best of my knowledge, given my age,
20 I make it a point to be honest and trustworthy.
21 That's my goal. And I wish your clients would do
22 the same.

23 Q So that's a yes to my question?

24 A I said what I said.

25 MS. MENNEMEIER: Okay. Then I have no

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 further questions.

3 MR. MATESKY: Okay. We can go off the
4 record, I think.

5 MS. MENNEMEIER: Yes, we can go off the
6 record.

7 (Time noted: 11:25 a.m. PDT)

Executed this _____ day of _____
202__, at _____, _____.
(city) (state)

TSG Reporting - Worldwide 877-702-9580

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

2 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

3 I, Marla Sharp, a stenographic reporter
4 certified in California, Oregon, and Washington,
5 hereby certify:

6 That the foregoing videoconference
7 deposition of GEORGE FREEMAN was taken remotely
8 before me on September 11, 2020, at which time the
9 witness was remotely duly sworn by me;

10 That the testimony of the witness and all
11 colloquy and objections made at the time of the
12 deposition were recorded stenographically by me and
13 thereafter transcribed, said transcript being a true
14 copy of my shorthand notes thereof;

15 That review of the transcript was
16 requested before completion of the deposition;
17 () that the witness has failed or refused to
18 approve the transcript.

19 I further certify I am neither financially
20 interested in the action nor a relative or employee
21 of any attorney of any of the parties.

22 In witness whereof, I have subscribed my
23 name and signature this date, September 26, 2020.

24 Marla Sharp

25 Marla Sharp, RPR, CLR, CCRR, WA CSR 3408

GEORGE FREEMAN - SEPTEMBER 11, 2020

NAME OF CASE:

DATE OF DEPOSITION:

NAME OF WITNESS:

Reason Codes:

1. To clarify the record.

2. To conform to the facts.

3. To correct transcription errors.

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

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Page _____ Line _____ Reason _____

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From _____ to _____

1 GEORGE FREEMAN - SEPTEMBER 11, 2020

NAME OF CASE:

2 DATE OF DEPOSITION:

3 NAME OF WITNESS: George Freeman

4 Reason Codes:

5 1. To clarify the record.

6 2. To conform to the facts.

7 3. To correct transcription errors.

8 Page 113 Line 19 Reason 3

9 From hopefully to clear

10 Page 119 Line 5-6 Reason 3

11 From We'd to machine

12 Page 150 Line 20-24 Reason 3

13 From And to trademark

14 Page 162 Line 24 Reason 3

15 From Oh to millenials

16 Page 163 Line 3-5 Reason 3

17 From I've to hands

18 Page _____ Line _____ Reason _____

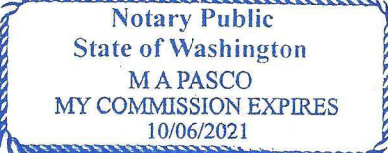
19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 Page _____ Line _____ Reason _____

23 From _____ to _____

24  Notary Public
State of Washington
M A PASCO
MY COMMISSION EXPIRES
10/06/2021

25

Matthew Pasco

George Freeman

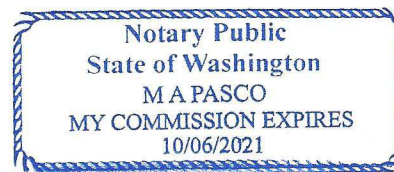
Errata -- George Freeman -- November 1st, 2020

Page:Line(s)	Now Reads	Should Read	Reason
113:19	"hopefully we're all be very clear"	"hopefully we'll all be very clear"	Grammar
119:5-6	"We'd have to go a Wayback Machine"	"We'd have to go through a Wayback Machine"	Clarity
150:20-24	"And if your intent is to confuse me, I don't think that's digging out the answer that you would want me to say something that isn't true and not pertinent to the issues of our brand and trademark."	"And if your intent is to confuse me, I don't think that's digging out the answer that you would want. I don't think you would want me to say something that isn't true and not pertinent to the issues of our brand and trademark."	Clarity
162:24	"Oh, gods. When you work with millenians...."	"Oh, gods. When you work with millennials...."	Spelling correction
163:3-5	I've got the most screwed-up e-mail system and bastardized because it's been in other people's hands."	"I've got the most screwed-up e-mail system and it has been bastardized because it's been in other people's hands."	Clarity

SUBSCRIBED AND SWORN TO ME BY GEORGE FREEMAN THIS 1st DAY OF November, 2020

Matthew Pasco
NOTARY PUBLIC

MY COMMISSION EXPIRES: 10/06/2021





Dylan Wall <wall.dylan@gmail.com>

How to **Get Ordained** | This needs to be re-worked in our favor ASAP! We need to become pro-active a beat these bastards to the punch!

1 message

george <george_galaxy@hotmail.com>
To: george <george_galaxy@hotmail.com>

Mon, Jan 12, 2009 at 10:15 AM

http://www.ehow.com/how_2312434_get-ordained.html?ref=fuel&utm_source=yahoo&utm_medium=ssp&utm_campaign=yssp_art

How to **Get Ordained**

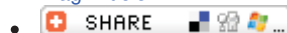
By [Malcolm Tatum](#), eHow Editor

I Did This Rate: (0 Ratings)

While legally recognized ordinations used to require years of study, there are now procedures that allow persons to be ordained by various ministries without the need to attend a theological school or under the sponsorship of a particular denomination or faith. While not all offers of ordination found on the Internet are legitimate, there are a number of legally incorporated ministries that do offer ordinations that will provide the legal rights and privileges afforded by many governments to any ordained minister of any faith. Here are some tips on how to find legitimate programs and entities that can grant ordinations.

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Instructions

Difficulty: Moderate

Step1

Check with your own religious denomination. Increasingly, many faiths are utilizing a combination of full time professional ministers and lay ministers who labor in the local congregation. In some cases, lay ministers may undergo a short period of training and become eligible for ordination. Depending on the denomination and its provisions for the function of ordained persons, the newly ordained lay minister may be granted authority to officiate at government recognized marriages as well as administer other religious rites associated with the denomination.

Step2

Search online for non-denominational ministries that offer ordination. This is often a helpful route for persons who wish to function as a full time minister, but prefer to not be tied to the structure of a particular religious denomination. Many independent ministries have some basic criteria for ordination and require an application. Approval of the application is necessary before the applicant can begin to comply with any terms and conditions that must be met prior to the issuing of a ministerial license. There is often usually some type of training, such as a correspondence course, that must be completed before ministerial credentials will be issued.

Step3

Pursue the courses of study recommended or required for ordination. This may include attending live classes, taking correspondence courses, attending online lectures or completing various types of written assignments. Often, there is a time frame required for completion of all necessary work, which may range from a few weeks to a year.

Step4

Follow the final application procedures for ordination. Often, sponsors require that once the applicant has fulfilled all the terms and conditions necessary for ordination, there must be a formal request to be ordained. This step is usually taken shortly after degrees or certificates of completion have been awarded for coursework and participation in seminars, online course or other established criteria.

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Exhibit O

AMM 00505

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[Become Ordained Minister](#)

[Legal ordination Online, Perform weddings and more. Women welcome.](#)
[openordination.org](#)

[Fast Christian Ordination](#)

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[www.christianharvestchurch.com](#)

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[Ordainment online to do weddings and religious services everywhere.](#)
[www.christianglorychurch.com](#)

[Become Ordained Minister](#)

[Christ Centered Known World Wide Ordination, Chaplaincy Since 1975](#)
[www.uaccci.org](#)

Tips & Warnings

- Always seek to find a sponsoring organization whose ideals and basic belief system are in harmony with your own. Also, look for organizations that provide ongoing support to their ordinands, such as networking with others in the organization, additional educational and training opportunities and counseling on how to deal with unusual situations that may arise during the course of providing ministry.
 - Stay away from ordination mills. These are online sites that offer instant ordinations with no attempt to verify your identity, require that you indicate agreement with the basic beliefs of the organization and offer no type of ongoing education or ministerial training. Often, these types of organizations are not universally recognized by civil authorities as being legitimate religious organizations and thus are not empowered to grant the same privileges afforded to the ministers of established and legally incorporated faiths.
-

Post a Comment

Post a Comment

Nancy Stephens

From: george <george_galaxy@hotmail.com>
Sent: Friday, December 12, 2008 11:27 AM
To: Justin Hartley; Jeff Vogt; webmaster@themonastery.org; 'Dylan Wall'; ulcseattle Seattle; Ulc Seattle;
Subject: [Invalid] Markup Validation of http://www.themonastery.org/index.php?destination=ministerWelcome - W3C Markup Validator
Attachments: image004.gif; image005.png; image006.png
Follow Up Flag: Follow up
Flag Status: Flagged

http://validator.w3.org/check?uri=http%3A%2F%2Fwww.themonastery.org%2Findex.php%3Fdestination%3DministerWelcome;accept=text%2Fhtml%2Capplication%2Fhtml%2Bxml%2Capplication%2Fxml%3Bq%3D0.9%2C*%2F*%3Bq%3D0.8;accept-language=en-us%2Cen%3Bq%3D0.5;accept-charset=ISO-8859-1%2Cutf-8%3Bq%3D0.7%2C*%3Bq%3D0.7

This is what comes up when people try to get ordained I just tried and it's not working.....consequently we have had 1 order since 9 am!

Pls. Call ASAP

George

Error please Contact: webmaster@themonastery.org

Exhibit P

Be at peace with God, whatever you conceive Him to be.

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Jeremy Brant <jeremyb@themonastery.org>

Exhibit Q

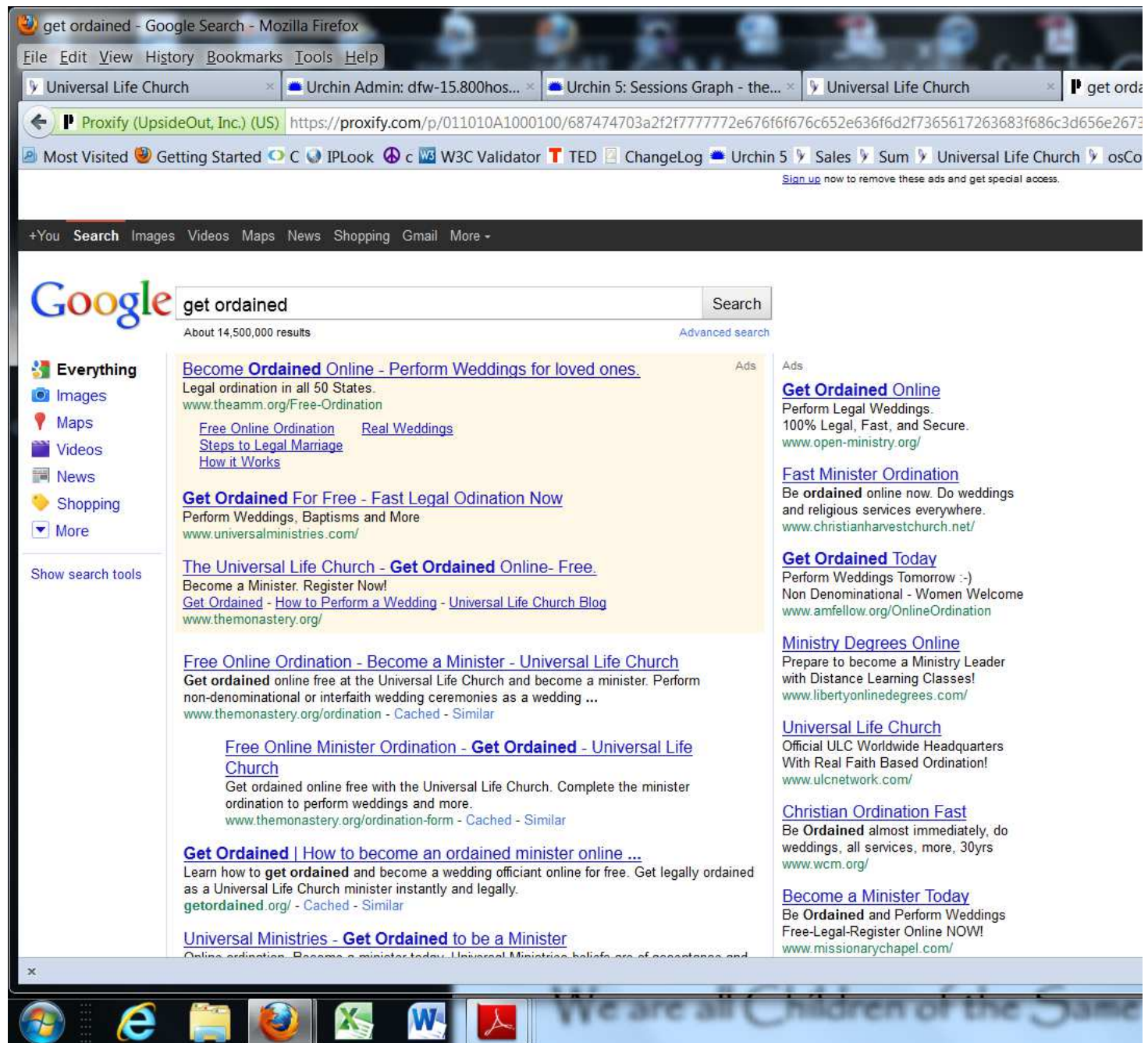
real estate on google PPC

2 messages

George Freeman <george_galaxy@hotmail.com>
To: George Freeman <george_galaxy@hotmail.com>

I'm curious how is Glenn at theamm.org able to get these indexes to take more real estate than anyone else? Secondly, how can we outfox him and do the same thing with our pages all the t
I'm referring to the top search result which not only shows Glenn's page, but 4 more of his pages below. Themonastery.org shows 3 links underneath to his 4, how do we get more?

George



george galaxy <george_galaxy@hotmail.com>
To: Jack Martin <jack@portentinteractive.com>, Ariana Burgess <aburgess@portentinteractive.com>

Fri, May 18, 2012 at 3:55 PM

My thought is that Glen's consumes more prime space and hence the propensity for the customer clicking on to a larger area of *real estate* that is not ours.
George

ULC Mnstry -- 002673

6/8/2020

ULC Monastery Mail - real estate on google PPC

Date: Fri, 18 May 2012 10:37:37 -0700
Subject: Re: real estate on google PPC
From: jack@portentinteractive.com
To: george_galaxy@hotmail.com
CC: aburgess@portentinteractive.com

George,

AdWords calls these Sitelink Extensions. Google allows you to choose whichever pages you want, and you can add as many as you like.

How these actually show up in Search is complicated. Google is always varying the ways ads are shown, so sometimes no sitelink extensions will be shown, sometimes only the top position will get sitelink extensions, and other times the top spots get sitelink extensions, like your example below (except universalministries.com probably doesn't have them set up). It actually looks like, in your example, theamm.org actually only has 4 sitelinks setup, even though Google is willing to show 6. The max that Google will show is 8 sitelinks, and that's how many we have setup for the ULC.

So this shows a slight advantage to being in the first position, because you're more likely to get more sitelinks. The benefit is not THAT great, however. For example, our Get Ordained campaign has a 7.62% conversion rate overall, and a 7.85% conversion rate when sitelinks appear.

For nonbranded campaigns like Get Ordained, the benefits of more sitelink extensions aren't great enough for us to want to be in the top position. I'm sure theamm.org has a much higher cost per click and cost per conversion being up in that top spot for nonbranded terms. Where sitelinks work best is with our branded campaigns. We're always aiming for the top spot for branded terms because the extra sitelinks can guide visitors to the exact Monastery page they're looking for.

Let me know if you have any more questions about this.

[Quoted text hidden]

--

Jack Martin
Copywriter and PPC Strategist

Portent, Inc.
An Internet Marketing Company
www.portent.com

ULC Mnstry -- 002674



Jeremy Brant <jeremyb@themonastery.org>

Document6

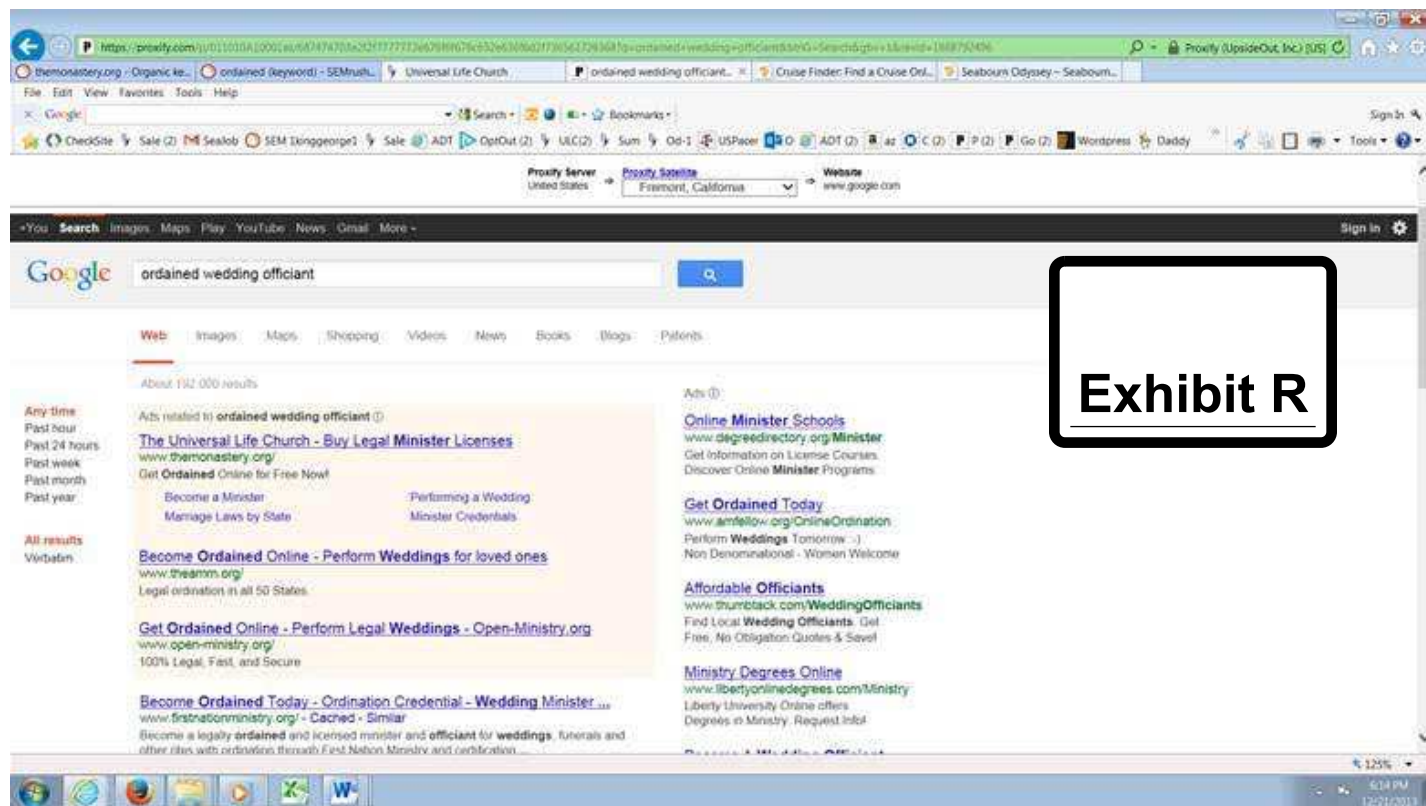
6 messages

George <GEORGE_GALAXY@hotmail.com>

Sat, Dec 21, 2013 at 6:25 PM

To: Timothy <timothy@portent.com>, Elaine Abiera <eabiera@portentinteractive.com>

Cc: Jeremy Brant <jeremyb@themonastery.org>, Jake Wible <jake@themonastery.org>



One gets ordained free, or becomes a minister, but never "SELLS" or "BUYS" in a church.

George

Document6.docx
244K

Elaine Abiera <eabiera@portentinteractive.com>

Thu, Jan 2, 2014 at 9:04 AM

To: George <GEORGE_GALAXY@hotmail.com>, Timothy <timothy@portent.com>

Cc: Jeremy Brant <jeremyb@themonastery.org>, Jake Wible <jake@themonastery.org>

Hi George,

Happy New Year! I hope you enjoyed the holidays. I am catching up on emails and wanted to know if there is an action item for the screenshot? Are you seeing ads with the words "sells" or "buys"?

Thanks,

Elaine

ULC Mnstry -- 002750

Elaine Abiera

Key Account Director

O: 206.575.3740 ext. 139

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Portent.com | [Facebook](#) | [Twitter](#) | [LinkedIn](#)

[Quoted text hidden]

george galaxy <george_galaxy@hotmail.com>

Thu, Jan 2, 2014 at 4:36 PM

To: Elaine Abiera <eabiera@portentinteractive.com>, Timothy <timothy@portent.com>

Cc: Jeremy Brant <jeremyb@themonastery.org>, Jake Wible <jake@themonastery.org>

About 171,000 results **today 1/2/2014**Ads related to **ordained wedding officiant****1. Become Ordained Online - Perform Weddings for loved ones**www.theamm.org/

Legal ordination in all 50 States.

[Free Online Ordination](#) [Steps to Legal Marriage](#)[How it Works](#) [Real Weddings](#)**2. The Universal Life Church - Buy Legal Minister Licenses**www.themonastery.org/Get **Ordained** Online for Free Now!

Universal Life Church Monastery has 426 followers on Google+

[Become a Minister](#) - [Performing a Wedding](#) - [Minister Credentials](#) - [The Forum](#)**1. Become Ordained Today - Ordination Credential - Wedding Minister ...**www.firstnationministry.org/ - [Cached](#) - [Similar](#)Become a legally **ordained** and licensed minister and **officiant** for **weddings**, funerals and other rites with ordination through First Nation Ministry and certification ...[Online Ordination](#) - [Wedding Officiants](#) - [Free Ministerial Ordination](#) - [California](#)**2. How to Become a Legally Ordained ...Wedding Officiant Laws. by**www.ordainmeplease.com/Wedding_Officiant_Laws.html - [Cached](#) - [Similar](#)**Wedding Officiant** Laws. by State. To Easily and IMMEDIATELY become an **ordained** minister... ***** CLICK HERE to apply for Ordination.*****. Join over 10,000 ...**3. Find a Wedding Officiant in your state | Online minister directory | Get ...**www.themonastery.org/wedding-officiants - [Cached](#) - [Similar](#)If you are not an **ordained** minister you will need to get **ordained**. ... Universal Life Church to perform the rites and ceremonies of the church, such as **weddings**, ...**4. Universal Life Church - ULC.org - Become Ordained**www.ulc.org/ - [Cached](#) - [Similar](#)Become **ordained** in minutes, perform weddings for family & friends. ULC.org. ... Looking for a **wedding officiant** to perform your wedding ceremony?**5. Making Sure That Online Officiant Is Legal - NYTimes.com**www.nytimes.com/.../weddings/making-sure-that-online-officiant-is-legal.html - [Similar](#)Nov 16, 2012 ... Couples who choose friends or relatives **ordained** for their ceremony ... away from traditional religious and civil **wedding officiants** in favor of ...**6. How to Become an Ordained Minister Online: 7 Steps**www.wikihow.com/Become-an-Ordained-Minister-Online - [Cached](#) - [Similar](#)As an **ordained** minister, you can officiate **wedding** ceremonies, baptisms, and other ... Without this letter, the **officiant** is not lawfully allowed to officiate licensed ...**7. First Person: Becoming a Wedding Officiant Online - Yahoo Voices ...**voices.yahoo.com/first-person-becoming-wedding-officiant-online-7447654.html - [Cached](#) - [Similar](#)Dec 23, 2010 ... After an amusing search, I became an **ordained** minister through the Universal Life Church.**8. How I Became an Ordained Wedding Officiant Online - Yahoo Voices**voices.yahoo.com/how-became-ordained-wedding-officiant-online-7449244.html - [Cached](#) - [Similar](#)Dec 23, 2010 ... Becoming an **ordained wedding officiant**, authorized to solemnize marriage, is easier than you might think.**9. Become an Ordained Wedding Officiant Online Free of Charge ...**

ULC Mnstry -- 002751

voices.yahoo.com/become-ordained-wedding-officiant-online-free-of-7467654.html - [Cached](#) - [Similar](#)

Jan 4, 2011 ... I chose ordainment online by the Universal Life Church, which instantly **ordained** me free of charge. Being **ordained** offered me the opportunity ...

10. Local **Wedding Officiant** Search - American Marriage Ministries

www.theamm.org/wedding-officiant-search - [Cached](#) - [Similar](#)

Dec 25, 2012 ... Find a local amm **wedding officiant** to officiate your wedding; ministers ... I became an **ordained** minister so I could marry my Moms....they have ...

Searches related to **ordained wedding officiant**

ordained wedding officiant online	ordained minister license
becoming ordained to marry	become ordained
ordained minister	getting ordained online
find ordained wedding officiant	become a legally ordained minister

From: eabiera@portentinteractive.com
 Date: Thu, 2 Jan 2014 09:04:17 -0800
 Subject: RE: Document6
 To: GEORGE_GALAXY@hotmail.com; timothy@portent.com
 CC: jeremyb@themonastery.org; jake@themonastery.org
 [Quoted text hidden]

Timothy Johnson <timothy@portent.com> Fri, Jan 3, 2014 at 1:41 PM
 To: george galaxy <george_galaxy@hotmail.com>
 Cc: Elaine Abiera <eabiera@portentinteractive.com>, Jeremy Brant <jeremyb@themonastery.org>, Jake Wible <jake@themonastery.org>

Hi George,

So are you saying you'd like to see a different wording used rather than "Buy Legal Minister License"? Just looking for a little extra clarification as to what you are looking for. Would it be better if we used a different word like "obtain"?

Thanks in advance for the clarification.

[Quoted text hidden]

--

Timothy Johnson
 PPC Strategist | 206.575.3740

Portent, Inc. – An Internet Marketing Company
Portent.com | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Google+](#)

george galaxy <george_galaxy@hotmail.com> Fri, Jan 3, 2014 at 8:51 PM
 To: Timothy <timothy@portent.com>
 Cc: Elaine Abiera <eabiera@portentinteractive.com>, Jeremy Brant <jeremyb@themonastery.org>, Jake Wible <jake@themonastery.org>

1. YES.
2. see; https://www.google.com/search?sourceid=navclient&ie=UTF-8&rlz=1T4LEND_en__US505&q=power+words+for+sales
"One gets ordained free, or becomes a minister, but never *"SELLS"* or *"BUYS"* in a church."
George

From: timothy@portent.com
 Date: Fri, 3 Jan 2014 13:41:03 -0800
 Subject: Re: Document6
 To: george_galaxy@hotmail.com
 CC: eabiera@portentinteractive.com; jeremyb@themonastery.org; jake@themonastery.org
 [Quoted text hidden]

Timothy Johnson <timothy@portent.com> Mon, Jan 6, 2014 at 3:40 PM
 To: george galaxy <george_galaxy@hotmail.com>
 Cc: Elaine Abiera <eabiera@portentinteractive.com>, Jeremy Brant <jeremyb@themonastery.org>, Jake Wible <jake@themonastery.org>

Thanks for helping clear up the confusion, George.

I have updated all our ads and removed the word "Buy" in favor of "Obtain".

ULC Mnstry -- 002752

6/8/2020

ULC Monastery Mail - Document6

Best,

[Quoted text hidden]

ULC Mnstry -- 002753



Dylan Wall <wall.dylan@gmail.com>

Proposed changes to our main page.

1 message

george <george_galaxy@hotmail.com>

Mon, Jan 12, 2009 at 10:30 PM

To: ulc monastery <ulcmonastery@gmail.com>

Cc: Dylan Wall <wall.dylan@gmail.com>, Glen Yoshioka <glentropy@gmail.com>, Jeff Vogt <jvogt@talklife.com>

Current

The [Universal Life Church](#) | **ULC** is the only denomination in the world that opens its doors to all, and welcomes all who ask to [Become an Ordained Minister](#). We are non-denominational. We support a full spectrum interfaith ministry. Over 20 million Universal Life Church ministers have been ordained online throughout the world. We make no religious hurdles, no hoops to jump through, no tests of loyalty, no rings to kiss and no fees to pay. The Universal Life Church represents freedom, and to have freedom you can not make demands upon individuals. In the Universal Life Church Monastery everyone is equal - the same level of greatness is enjoyed by all. We will be your personal minister/consulate and advisor, with your consent at no charge to you. We ordain all who ask and welcome you to the Universal Life Church Monastery Ministries.

Proposed

The [Universal Life Church](#) | **ULC** is the only denomination in the world that opens its doors to all, and welcomes all who ask to [Become a Ordained Minister](#). We are non-denominational. We support a full spectrum interfaith ministry. **Millions of** Universal Life Church ministers have been ordained online throughout the world. We make no religious hurdles, no hoops to jump through, no tests of loyalty, no rings to kiss and no fees to pay. The Universal Life Church represents freedom, and to have freedom you cannot make demands upon individuals. **At the** Monastery everyone is equal - the same level of greatness is enjoyed by all. We will be your clergy, priest, minister, consulate and advisor, with your consent at no charge to you. We ordain online, all who ask to **get ordained.**

 **Doc1.docx**
13K

Exhibit S



Dylan Wall <wall.dylan@gmail.com>

RE: New Ordination

2 messages

george galaxy <george_galaxy@hotmail.com>

Mon, Oct 27, 2008 at 10:54 AM

To: Alex <pearsonat@gmail.com>

Cc: ulcseattle Seattle <ulcseattle@hotmail.com>

I'm pressed for time but within the next two weeks I do want to have dinner with you and the others and discuss the Canadian expansion program...what time will be best for everybody?

I'm asking Br. Glen to send you a wallet card and our printed Certificate ASAP. Would you post it on your Facebook/Myspace pages and in your bcc.eu page. Pls ask our other two friends to **get ordained** so that we can have them do the same. Lastly we need an army of North Americans to use our Forum pages to attack the old school or religious thought that prevails in the US....let's talk and develop this at dinner next time.

Alex...Glen will need all the mailing address.
Geo.

From: pearsonat@gmail.com
To: george_galaxy@hotmail.com
Subject: Fwd: New Ordination
Date: Mon, 27 Oct 2008 10:21:55 -0700

Hi George,

Here's the e-mail that I got when I was ordained by the ULC! Thanks for everything!

Alex Pearson
Pearsonat@gmail.com
On the go

Begin forwarded message:

Exhibit T

From: "Universal Life Church Ordination:" <webmaster@themonastery.org>
Date: May 31, 2008 1:37:06 AM PDT (CA)
To: pearsonat@gmail.com
Subject: New Ordination

UNIVERSAL LIFE CHURCH MONASTERY**WELCOME to the UNIVERSAL LIFE CHURCH MONASTERY**

AMM 00577

Reverend
Alexander Tristan Pearson

NOTE: PLEASE READ AND RETAIN THIS DOCUMENT FOR YOUR RECORDS.

If you have entered a false name, recognize that your credentials will be invalid. All states require you to use your legal name when signing any legal document

Congratulations! You are now a legally ordained minister for life, though you may relinquish your credentials at any time. YOU HAVE BECOME A MEMBER OF THE PRESTIGIOUS CLERGY. You have earned a title worthy of admiration and respect.

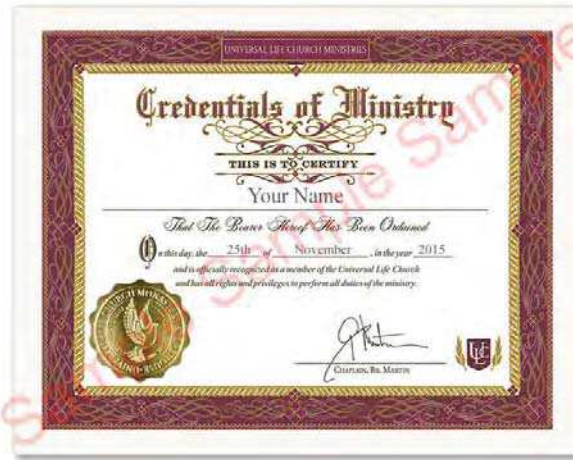
Let it be known on this date that in accordance with the laws of the Universal Life Church Monastery, as ordaining officer, I, Brother Martin, do ordain you into our ministry. From this day forward, you are entitled to all of the rights of an ordained minister. You have the authority to perform marriages, baptisms, and all other ceremonies of the church. You are an independent minister of this church. This is a position that carries with it a burden of responsibility; please respect others and comply with the laws of the land.

Your ordination record will be filed at our headquarters, 1425 Broadway #67, Seattle, WA 98122. These records can be accessed by contacting the church at the above address, by fax: 206-285-7888, or at webmaster@themonastery.org.

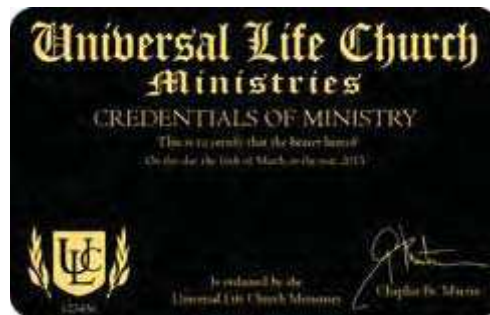
Although this letter certifies that you have been ordained through the church and in the eyes of God, most states require additional documentation in order for you to exercise your religious authority. It may be necessary for you to possess an official printed certificate, signed and affixed with the church's seal, before performing any religious ceremonies. SHOULD YOU WISH TO PURCHASE OFFICIAL COPIES OF YOUR CREDENTIALS, visit our online store <http://www.themonastery.org>

We offer a wide variety of beautiful certificates for weddings and baptisms, religious doctorate degrees and packages. Please visit our online catalog of Ministry Products to see what we have available. Anyone you marry will love the selection of designs we offer.





ULC Monastery Ordination Credential



Wallet Credential is printed in Black with gold lettering on both sides of the highest grade of plastic card stock available.

View your online credentials



If you want to show your support for the ULC, you can post our flags in your website, myspace, facebook, or any other social networking site of your choice.

-----begin cut here -----

```
<a href="http://www.themonastery.org/?id=2342" alt="Universal Life Church Monastery ">
  <a>
```

-----end cut here -----

Sincerely,
Brother Martin

www.themonastery.org

ULC Monastery Seattle Fulfillment Center
1425 Broadway # 67
Seattle, WA 98122
FAX: (206) 285-7888

george galaxy <george_galaxy@hotmail.com>

Mon, Oct 27, 2008 at 11:57 AM

To: Glen Yoshioka <glentropy@gmail.com>, Ulc Seattle <ulcmonastery@gmail.com>, Dylan Wall <wall.dylan@gmail.com>

Glen

For follow-up...ASAP

From: pearsonat@gmail.com

To: george_galaxy@hotmail.com

Subject: Re: New Ordination

Date: Mon, 27 Oct 2008 11:54:25 -0700

Will do George! I'll get Chris and kristine Hutchinson to **get ordained** asap. Also I will for sure be putting the ULC on all my pages.

As for my address it is
3450 welwyn street
Vancouver bc, canada
V5N 3Y7

We'll talk soon

Alex Pearson

Pearsonat@gmail.com

On the go

[Quoted text hidden]



Jeremy Brant <jeremyb@themonastery.org>

(no subject)

1 message

george galaxy <george_galaxy@hotmail.com>

Thu, Jun 7, 2012 at 5:49 PM

To: Jack Martin <jack@portentinteractive.com>, Ariana Burgess <aburgess@portentinteractive.com>

1. Become Ordained Online - Perform Weddings for loved ones.

Legal ordination in all 50 States

theamm.org/Free-Ordination

Free Online Ordination Real Weddings
Steps to Legal Marriage
How it Works

2. Get Ordained For Free - Fast Legal Odination Now

Perform Weddings, Baptisms and More

universalministries.com/**3. The Universal Life Church - Get Ordained Online- Free.**

Become a Minister. Register Now!

[Get Ordained - How to Perform a Wedding - Universal Life Church Blog](#)themonastery.org/

Glen and Dylan are getting more space than we,

Free Online Ordination Real Weddings
Steps to Legal Marriage
How it Works

How do we gain more real-estate?

George.

Exhibit U

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

AMERICAN MARRIAGE
MINISTRIES,

Opposer,

v.

UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE,

Applicant.

Opposition No. 91237315

DECLARATION OF GEORGE
FREEMAN

I, George Freeman, declare as follows:

1. I am the President of Applicant Universal Life Church Monastery Storehouse (“ULC Monastery”) and have held that role since ULC Monastery was incorporated in 2006.
2. I am over the age of eighteen years and otherwise competent to testify in this matter.
3. I make this declaration based on my personal knowledge.
4. ULC Monastery formerly employed Dylan Wall, Glen Yoshioka, Maurice King, and Lewis King, before they became affiliated with the Opposer in this action, American Marriage Ministries.
5. In the course of their employment, ULC Monastery shared information with Mr. Wall, Mr. Yoshioka, and Messrs. King that ULC Monastery intended and expected to remain confidential and used solely for ULC Monastery purposes.

Exhibit W

6. Such information included emails and other documents comprising information regarding keyword advertising, marketing, and search engine optimization efforts.

7. It was ULC Monastery's intention and expectation that its employees, including Mr. Wall, Mr. Yoshioka, and Messrs. King, would not retain such internal and confidential ULC Monastery information after their departure from ULC Monastery.

8. On January 16, 2019, I was deposed in this matter by counsel for Opposer American Marriage Ministries ("AMM").

9. I am 30 years old, and was 40 years old on the date of my deposition.

10. I suffer from hearing loss, both now and on the day of my deposition. I use a hearing aid in each ear to compensate for such hearing loss.

11. During my deposition, I repeatedly had trouble hearing and understanding the questions posed by AMM's counsel. I reference this problem, for example, at page 23, lines 3-4 of my deposition transcript.

12. During my deposition, the battery in one of my hearing aids, and then the second of my hearing aids, lost power. I refer to this on page 77, lines 18-19 of my deposition transcript.

13. During my deposition, AMM's counsel asked me the same thing multiple times.

14. For example, AMM's counsel asked me what it means to be "ordained" and what the words "Get Ordained" mean multiple times.

15. To me, in the abstract, the words "get ordained" refer to an individual's recognition of a calling or motivation to fulfill a spiritual purpose. It is not an act that another person can perform for you, but an act or recognition that occurs within oneself. This is a

paraphrase of what I told AMM's counsel relatively early on during my deposition, at page 15, lines 12-21 of my deposition transcript.

16. However, AMM's counsel continued to ask me what "get ordained" meant.

17. At one point, AMM's counsel asked me "What does the phrase 'get ordained' mean to you?" This is on page 41, line 21 of my deposition transcript. She did not ask what it means when used in connection with ULC Monastery's services or in any other particular context. I simply repeated the words "get ordained" and said they were "self-explanatory," as shown on page 41, lines 22 and 24 of my deposition transcript.

18. I gave this response in part because I was frustrated at being asked the same thing multiple times, despite already answering, and having a hard time hearing AMM's counsel.

19. What I meant by my response, was that I had already explained what I believe it means to be "ordained." In fact, I told her "I think I explained that earlier" on page 42, line 14 of my transcript.

20. In its motion, AMM claims that I "understand[] the phrase 'get ordained' to refer to the generic meaning of the phrase rather than to ULC's services." This is not an accurate description of my understanding, my beliefs, or my deposition testimony.

21. I do not believe that the term "get ordained" has any generic meaning in relation to ULC Monastery's services.

22. I do not believe that the term "get ordained" is used or understood as the common term for any class or category of services provided by ULC Monastery.

23. The common terms for services provided by ULC Monastery would include terms like “church services,” “religious services,” “ecclesiastical services,” “marriage ministry services,” or “online store services.”

24. I have been involved in the field of religious services for well over thirty years and have never heard anyone refer to “get ordained” or “get ordained services” as a common or generic term for any class or category of services, including any services provided by ULC Monastery.

25. AMM’s counsel did not ask me what I thought the words “get ordained” meant, primarily, to me or to others when they are used by ULC Monastery on or in connection with the services provided by ULC Monastery.

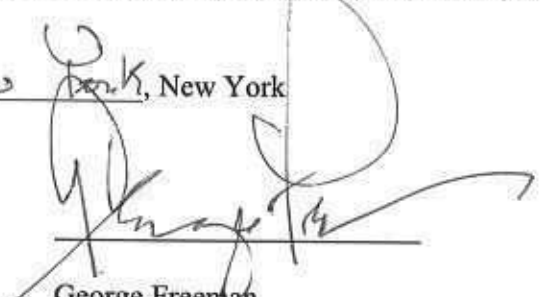
26. I believe, and made clear in my deposition testimony, that the words “get ordained” could have different meanings to different people when used in different contexts. For example, I believe, and testified, that “I am not the sole authority” at page 43, line 10 of my deposition transcript and that “There’s a thousand meanings I think you can construct those two words and carry it onto another achievement” on page 44, lines 8-10 of my deposition transcript.

27. Thus, it is certainly possible for someone out in the world to use the words “get ordained,” in some context, and not refer to ULC Monastery, just in the same way someone could tell an athlete worried about how they are going to finish a marathon that they need to “just do it,” without referring to Nike.

28. However, when the phrase “Get Ordained” is used prominently in connection with the religious services, ecclesiastical services, and religious and spiritual information services provided by ULC Monastery in the manner that trademarks are typically used—as on

the GetOrdained.org website, for example—I believe those words mean and are understood as an identification of who is providing the services (ULC Monastery), the same way that “Just Do It” printed on the tags of athletic shoes is understood to identify who is providing the shoes (Nike).

DATED: October 30, 2019 at New York, New York



George Freeman